
FINAL ENVIRONMENTAL IMPACT REPORT 1299 Sansome Street Office Building 81.415 E

PUBLICATION DATE: April 16, 1982

PUBLIC COMMENT PERIOD: April 16 - May 20, 1982

PUBLIC HEARING DATE: May 20 1982

CERTIFICATION DATE: JUNE 10, 1982

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CITY AND COUNTY OF SAN FRANCISCO SAN FRANCISCO CITY PLANNING COMMISSION

FINAL ENVIRONMENTAL IMPACT REPORT 1299 SANSOME STREET OFFICE BUILDING 81.415 E

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- Changes or additions to the Draft EIR are indicated by solid dots at the beginning of each revised section, paragraph, table or figure.

REF 711.4097 T917f

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SUMMARY

A. PROJECT DESCRIPTION

Objectives of Project Sponsor

The proposed structure is intended to provide the corporate headquarters and general office space primarily for two independent, but related, real estate development firms, Gerson Bakar & Associates, and the Wilsey-Bennett Company. The two firms have outgrown their current space at 2280 Powell Street in San Francisco and need room for firm expansion.

Proposed Project and Project Site

The proposed project is a 44,550 gross square foot, seven-story office building with ground floor retail space to be located at 1299 Sansome Street, at the foot of the Filbert street steps adjacent the east face of Telegraph Hill (Assessor's Block 106, Lot 1).

Project Use, Zoning and Design

In addition to the two firms noted above which would occupy the building, an area of about 15,000 net rentable square feet would be leased to an outside tenant such as a law firm on a five to ten-year term basis, and would provide expansion space for the future growth of Gerson Bakar & Associates and the Wilsey-Bennett Company. In addition, approximately 3,000 net rentable square feet of the 5,400 first floor net rentable square feet may be reserved for commercial use such as bank branch or savings and loan, or for retail use.

The site was previously occupied by King's Antiques, a firm dealing in antique residential furniture and decorative souvenirs. King's Antiques vacated the project site in January 1982. The structure currently occupying the 7,200 square foot project site is a single-story warehouse of concrete and wood frame construction. The project site is zoned C-2, Community Business District and also lies within the Northern Waterfront Special Use District No. 3. Development in the area is subject to the general provisions outlined

in the City Planning Code for C-2 districts, but these may be superceded by additional regulations imposed by the provisions of the Special Use District. The basic Floor Area Ratio (FAR) in the C-2 District is 3.6:1. The basic FAR in the Special Use District is 5:1. Thus, any building on the site may contain a total gross floor area of up to 5 times the area of the lot, or 36,000 gross square feet. In addition, a bonus of 25% may be obtained for the property which qualifies under the code as a corner lot. For the project, the allowable floor area is 45,000 gross square feet, or an FAR of 6:25:1. The project site lies within the 84-E Height and Bulk District which provides for an 84-foot height limit, a horizontal dimension limited to a maximum length of 110 feet and a maximum diagonal dimension of 140 feet above 65 feet. The proposed structure would conform to the requirements of the 84-E Height and Bulk District. The proposed structure would rise 84 feet above Sansome Street. The building's exterior walls would be fabricated from precast concrete panels with the windows set in from the building's outer walls. The concrete surfaces would be sandblasted to create a texture similar to the stucco surfaces of the existing structure and portions of the Walters' warehouse and penthouse opposite the site on Filbert Street. The concrete would contain a light buff or beige color similar to the light earth-tone colors of the rock face of Telegraph Hill bordering the west margin of the site. The roof of the structure would be surfaced with a light buff colored gravel to complement the color of exterior portions of the building.

Windows of the structure would be light-grey tinted glass, set in grey aluminum window frames. The major design feature of the building would be the horizontally terraced, stepped building wall originating at the second level and extending to the roofline. The terraced and stepped-back building wall would orient toward the intersection of Filbert and Sansome Streets and would contain plant materials installed in planters built into the terraces. (Note that the design of the northeast corner of the proposed building has been changed from that which was described in the Initial Study. The new design is intended by the project sponsor and project architects to better address Urban Design Policies of the City's Comprehensive Plan. Refer to the Alternatives of this report as well as the Initial Study Checklist for a description of the former design.)

All mechanical equipment including elevator drive mechanisms would be contained within the building's interior; no mechanical penthouses would be constructed on the roof.

Construction is scheduled to begin in July 1982 and the building would be ready for occupancy in August 1983.

B. ENVIRONMENTAL IMPACTS

An Initial Study of the proposed project was published on March 19, 1982, and a determination was made that an Environmental Impact Report was required. Issues that were considered to require no further discussion as a result of the Initial Study include: Land use compatibility, noise, public services and utilities, water and energy resources, transportation and parking, air quality, wind, biology, population and housing, and cultural and historic resources, the effects of which are summarized in the Initial Study, Appendix, page A-1. This Environmental Impact Report addresses the urban design/visual and geologic effects of the proposed project.

- Urban Design/Visual: The project would be viewed as a structure of less bulk than most surrounding buildings while incrementally increasing the intensity of land use at the Base of Telegraph Hill. The building would serve as a structural mass which could provide a visual transition between larger buildings of the Levi's Plaza project and smaller dwelling units and apartment buildings on the upper portions of Telegraph Hill. The project would extend the area development pattern closer to Telegraph Hill, becoming a foreground element to views of the area from hillside locations. Existing, exposed slopes of the hill adjacent the project site would be blocked from view from Levi's Plaza and from travelers along Sansome Street.

From lower portions of Telegraph Hill, the structure would partially obstruct views to the Levi's Plaza building opposite the project site, but would not block views to the Bay, Bay Bridge or San Francisco skyline in the background.

Geology and Soils: About 1,300 cubic yards (up to 3,500 tons) of rock debris would be excavated to bring the site to the proposed grade, including the removal of accumulated rockfall material from the southwest corner of the site.

Vibration during site excavation and drilling would not jeopardize the stability of the portion of Telegraph Hill adjacent the project site. However, areas of loose rock and soil could be susceptible to fall or ravel from the vibration and activity of construction. These rockfalls and ravellings can be expected to be of the same magnitude and nature as those which have previously occurred and which will occur in the future.

C. MITIGATION MEASURES PROPOSED AS PART OF THE PROJECT

Noise: Ventilation and air conditioning cooling towers would be housed in a sound-insulated "chimney" at about the fifth floor level.

Public Services: The project sponsor would assign a fire safety director for the building who would be trained through a fire prevention course provided by the Bureau of Fire Prevention.

The building design would incorporate lighting and internal security features in elevator, stairwell and entry door areas. Exterior lighting would be designed to reduce opportunities for crime.

An evacuation and emergency response plan would be developed by the project sponsor or building management staff, to insure coordination between the City's emergency planning activities, and to provide for building occupants in the event of an emergency.

Transportation: The project sponsor would contribute to a fund for maintaining and augmenting transportation services through an equitable funding mechanism established by the City.

The project sponsor would encourage transit use by employees.

The project sponsor would implement a flexible time system for employee working hours.

The project sponsor would conduct a survey in accordance with methodology approved by the Department of City Planning to assess actual trip generation patterns of project occupants, and actual pickup and drop off areas for car poolers and van poolers.

During the construction process, pedestrian access would be maintained along Sansome Street adjacent to the project site and along the Filbert Street steps.

Eyebolts (to support future MUNI electrification wires) would be incorporated into the project.

One on-street freight loading space would be provided on Filbert Street.

The project sponsor would request increased enforcement of parking regulations in the area.

Energy: Recessed fluorescent lighting fixtures would be the return air/heat extract type to improve fixture efficiency and reduce cooling load requirements.

Fluorescent fixtures would contain three tubes, allowing the user to select one-third, two thirds or full-level light output.

HVAC equipment with the highest coefficient of performance would be used.

An air type economizer cycle would be used to take advantage of outside air when it is cool enough to provide cooling without using the chiller.

Inlet vanes on the main supply fans would be used to reduce the horsepower during partial load conditions.

Reset temperatures would be used to reduce or turn off boiler as the outside temperature rises.

Reset temperatures would be used to provide only enough cooling to satisfy the warmest zone.

"Dead band" type variable air volume boxes and room thermostats would be used to ensure that simultaneous cooling and heating do not occur.

Insulated walls, roofs and floors would be constructed to provide the best heat-resistant envelope possible.

Visual: Street trees would be provided along Sansome and Filbert Streets in the front of the building.

The northeast corner of the building would be terraced inward from the second floor to the roof to avoid obstruction of views to the Bay from Telegraph Hill.

Mechanical equipment would be housed within the building's interior to improve rooftop appearances.

The existing earthen bank near the foot of Filbert Street steps would be planted with flowering shrubs.

The project sponsor would assist the City and interested members of the community in determining a design solution to constructing a permanent landing at the terminus of the Filbert Street steps. The project sponsor would pay for the improvements.

Geology and Soils: Special shoring of Telegraph Hill slopes and excavation procedures would be provided during construction.

To mitigate the damaging effect of falling rock and rocky debris from adjacent uphill properties, the proposed building would be protected by an impact barrier separated from the building.

The structure would be designed to meet the seismic design standards of the Uniform Building Code (UBC) and the Structural Engineers Association of California (SEAOC).

Nonstructural elements such as hanging light fixtures, hung ceilings, wall partitions, bookcases and mechanical equipment would be firmly attached to prevent them from falling during an earthquake.

The ground floor slab should be provided with an underdrain system of perforated pipes and a six-inch thick layer of permeable material draining to a sump to remove seepage water and runoff.

D. ALTERNATIVES

Alternatives considered include the No-Project Alternative which examines maintaining the current condition of the site; the alternative of constructing a building that conforms to the San Francisco Planning Code; constructing lower buildings than proposed; alternative site uses of commercial and housing; and prior design alternatives.

I. PROJECT DESCRIPTION

A. OBJECTIVES OF PROJECT SPONSOR

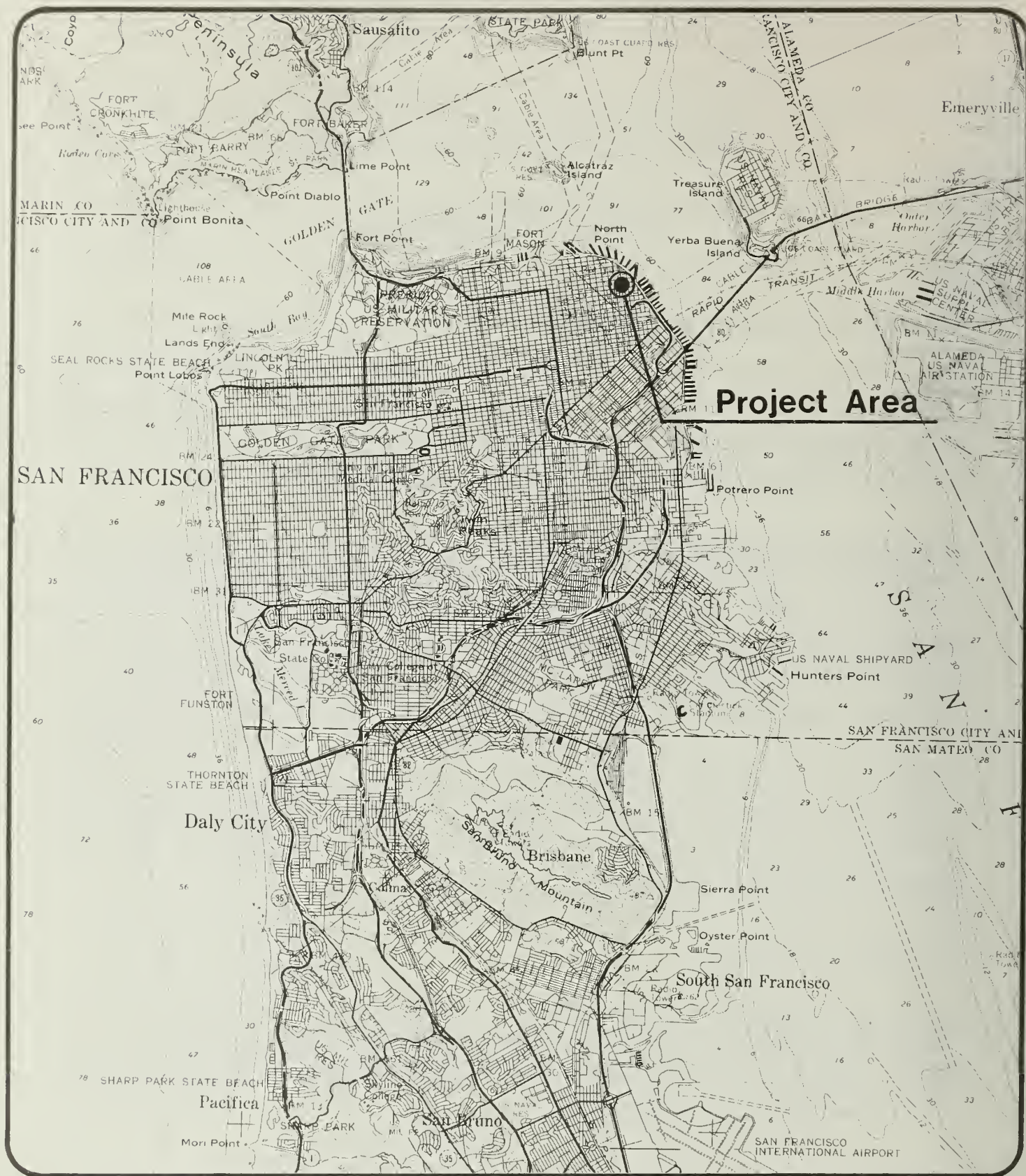
The proposed project is a 44,550 gross square foot, seven-story office building with ground floor retail space. The building is intended to provide the corporate headquarters and general office space primarily for two independent, but related, real estate development firms, Gerson Bakar & Associates, and the Wilsey-Bennett Company.

The project is being proposed by the project sponsor, known as Trust of Three, because Gerson-Bakar & Associates and the Wilsey-Bennett Company have outgrown their current office space at 2280 Powell Street in San Francisco and need room for firm expansion. Both firms wish to remain in San Francisco and expand their San Francisco-based work force. Each firm considered relocating part or all of its work force to areas outside San Francisco, where office space currently is available or less expensive, but rejected the idea because both firms feel a commitment to San Francisco, where a large portion of their business is conducted, and to their combined work force of 55, the majority of whom reside in San Francisco. In addition, during the past year, the project sponsor has investigated leasing office space in various locations in San Francisco, but no space suitable for the operations of either firm was located.

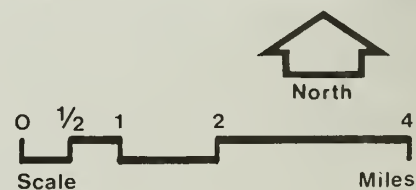
B. PROJECT LOCATION

The project is proposed to be located at 1299 Sansome Street, at the foot of the Filbert Street steps adjacent the east face of Telegraph Hill (Assessor's Block 106, Lot 1). The general location of the project site is shown in Figure 1, page 8; the precise location of the project site is shown in Figure 2, page 9.

The site was previously occupied by King's Antiques, a firm dealing in antique residential furniture and decorative souvenirs (Figures 3, 3a, 4 and 4a, pages 10, 10a, 11 and 11a). King's Antiques vacated the project site in January 1982 when the lease term on the existing structure expired. It is not known where King's Antiques relocated or if the company remained in business at a new location.



Regional Location Map



Source: U.S. Geological Survey

Figure No. 1



VIEW OF PROJECT SITE FROM WEST ENTRANCE TO LEVI'S PLAZA. FILBERT ST. STEPS ON RIGHT OF PHOTOGRAPH. PHOTOMONTAGE OF PROJECT SHOWN BELOW.



Project Area Photographs: View 1

SOURCE: EIP Corp.

● Figure No. 3



VIEW NORTH OF PROJECT SITE FROM SANSOME ST. WALTERS WAREHOUSE AND PENTHOUSE IS IN THE BACKGROUND. PHOTOMONTAGE OF PROJECT SHOWN BELOW.



Project Area Photographs: View 2

SOURCE: EIP Corp.

● Figure No. 3a



VIEW SOUTH OF PROJECT SITE FROM SANSOME ST. PHOTOMONTAGE OF PROJECT SHOWN BELOW .



Project Area Photographs: View 3

SOURCE: EIP Corp.

● Figure No. 4



PROJECT SITE AS SEEN FROM LEVI'S PLAZA COMPLEX. PHOTOMONTAGE OF PROJECT SHOWN BELOW.



Project Area Photographs: View 4

SOURCE: EIP Corp.

● Figure No. 4a

C. PROJECT USE

The proposed structure would be a multiple-tenant occupancy building. In addition to the two firms noted which would occupy the building, an area of about 15,000 net rentable square feet would be leased to an outside tenant, such as a law firm, on a five to ten-year term basis, and would provide expansion space for the future growth of Gerson Bakar & Associates and the Wilsey-Bennett Company. In addition, approximately 3,000 net rentable square feet of the 5,400 first floor net rentable square feet may be reserved for commercial use such as a bank branch or savings and loan, and for retail use.

The project would have the following employment/occupancy characteristics:

<u>Firm Name</u>	<u>Proposed Rentable Sq. Ft. Occupancy</u>	<u>Number of Employees</u>
Gerson Bakar & Associates	9,000	25
Wilsey-Bennett Company	9,300	30
Proposed Office Tenant	15,000	60
Proposed first floor commercial tenant (or office)	5,400	20

Source: Gerson Bakar & Associates

Since the building will be occupied and owned primarily by Gerson Bakar & Associates and the Wilsey-Bennett Company, it is difficult to state actual rental rates. It is projected that the occupancy cost (mortgage expense and building operating costs) to the two firms would approximate \$25-28 per gross square foot of office space per year. If a law firm or other outside business rents space within the building, it is projected that the rental rate would approximate \$28 per gross square foot per year.

D. ZONING AND PROJECT DESIGN CHARACTERISTICS

The project site is roughly square, measuring 80 feet along Sansome Street and 90 feet along Filbert Street, consisting of 7,200 gross square feet of lot area. The project site is within the C-2 (Community Business) Use District (Figure 2, page 9), and is within the

Northern Waterfront Special Use District No. 3 (see Section II.A., Site Characteristics, page 18).

The basic Floor Area Ratio allowable (FAR) in the C-2 District in the project area is 3.6:1. The basic FAR in the Special Use District is 5:1. Thus, any building on the site may contain a total gross floor area of up to five times the area of the lot, or 36,000 gross square feet. In addition, a bonus of 25% may be obtained for the property which qualifies under the code as a corner lot (area within 125 feet of a corner). For the project site, the allowable floor area is 45,000 gross square feet, or an FAR of 6.25:1. The proposed structure would contain about 44,550 gross square feet which would yield an FAR of 6.18:1. Net rentable (occupied) space would amount to about 38,700 square feet. The project site lies within the 84-E Height and Bulk District which provides for an 84-foot height limit, a horizontal dimension limited to a maximum length of 110 feet and a maximum diagonal dimension of 140 feet above 65 feet. The proposed structure would be 84 feet in height, contain a maximum horizontal dimension of 90 feet and a maximum diagonal dimension of 110 feet above 65 feet, conforming to the requirements of the 84-E Height and Bulk District (Figures 5, 6, 7 and 8, pages 14, 15, 16 and 17). No parking is proposed to be constructed on the site, but project parking would be provided off-site within an 800-foot walking distance at an existing parking facility under a 90-year lease agreement.

- The project sponsor would seek a variance from Article 1.5, Section 151 of the City Planning Code to allow an exemption from the off-street parking requirement and would include a provision such as the following:

The project sponsor would contribute up to \$5,000 to the DCP to cover the cost of the design, administration and analysis of a parking survey of Block F garage users and other parking resources within the area, as appropriate. The survey would take place within one year of full build-out and occupancy of both the proposed project and the Levi's Plaza development. If the survey identified a 90% or higher occupancy rate of Block F garage parking spaces and a high utilization (80% or greater) of other parking resources in the area, the project sponsor would convert unused storage space within the Block F garage to parking, would work with the DCP to design an acceptable operational management system for tandem parking, or would provide valet parking for the life of the project and would seek all appropriate permits to fulfill this requirement.

Construction of the building would require demolition of the existing structure on the site. Construction is scheduled to begin in July 1982 and the building would be ready for occupancy in August 1983.

E. REQUIRED APPROVALS

The proposed project building permit application may be subject to Discretionary Review by the City Planning Commission.¹ In granting or denying the permit, the Commission could take into consideration the effect of the proposed project on such resources on issues as enhancement of the pedestrian environment; preservation of architecturally and historically significant buildings; preservation of housing; avoidance of industrial displacement; adequate and appropriate means of transportation to and from the project site; energy conservation; physical relationship of the proposed building to its environs; and effects on views from the public areas and on the City skyline.

¹The Development staff or a concerned project neighbor may request that the Commission hold a public hearing and take action on the project, pursuant to the Commission's power of discretionary Review (section 26 of the License Code, Part III of the San Francisco Municipal Code).

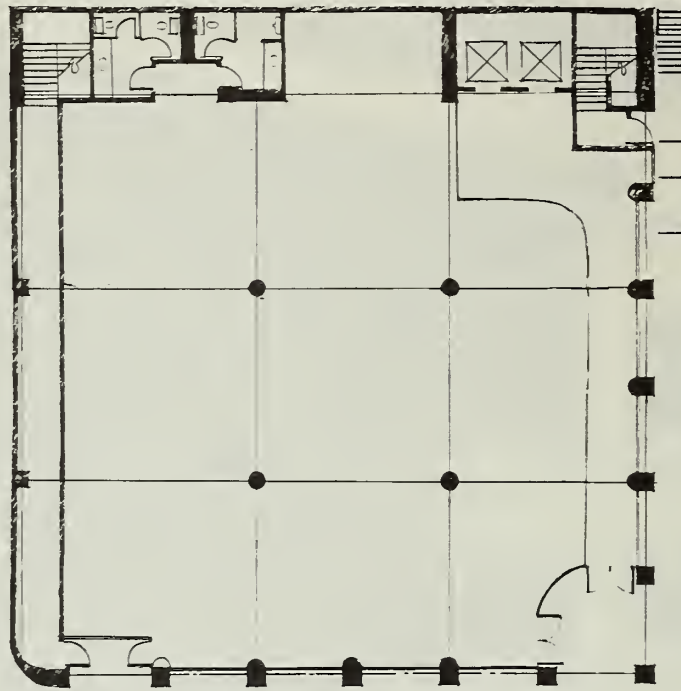


Model Photograph of Major Building Form and Detail Concepts

Source: H.O.K. Associates

● Figure No. 5

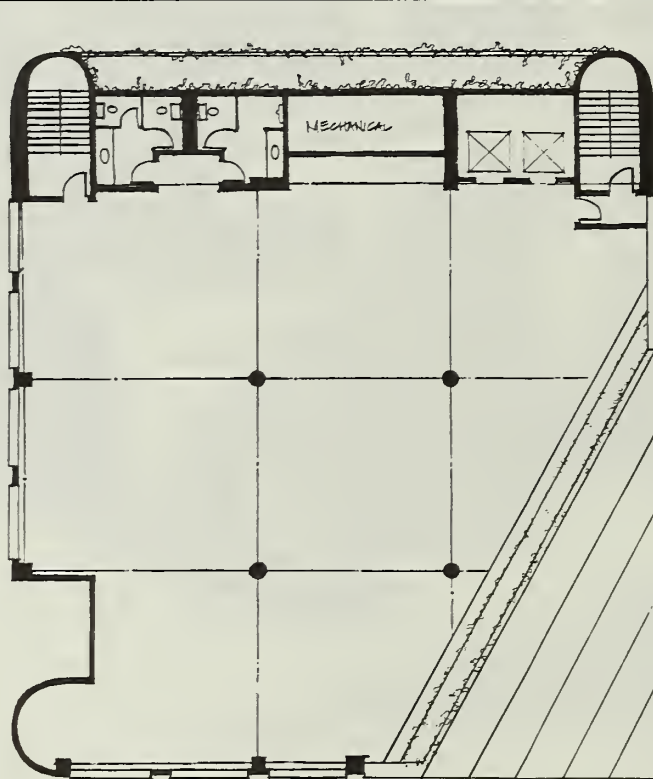
First Floor Plan



Approximate location of Filbert St. steps and landing. Final location to be determined.

Sansome St.

Seventh Floor Plan

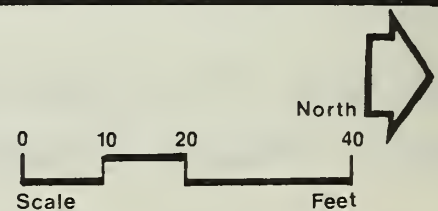


Approximate location of Filbert St. steps and landing. Final location to be determined.

Filbert St.

Sansome St.

Representative Floor Plans

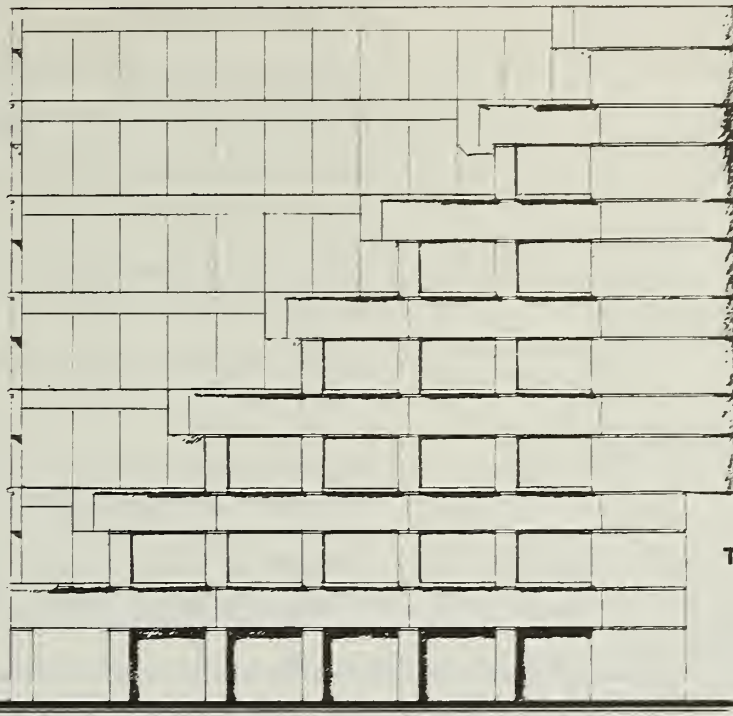


Source: H.O.K. Associates

Figure No. 6

**North
Elevation**

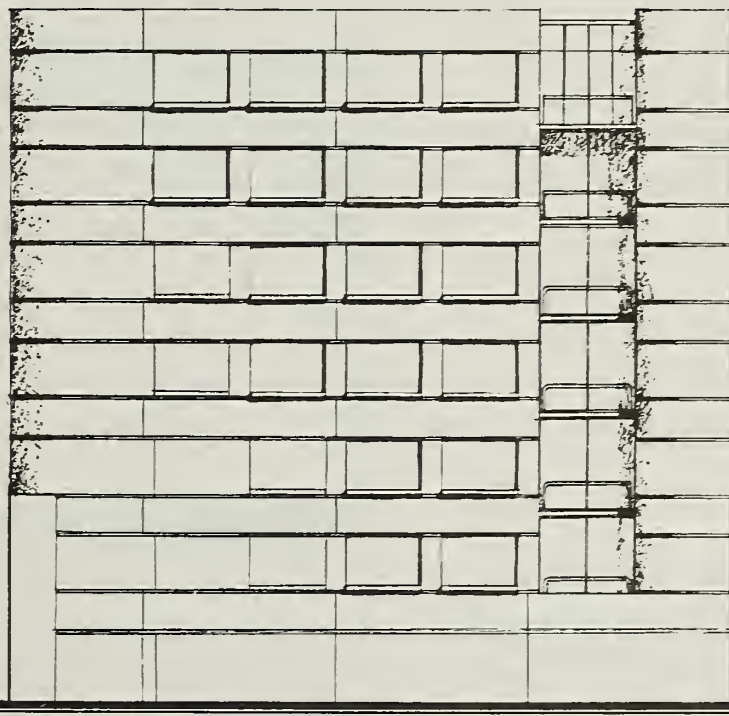
Sansome St.



Telegraph Hill

**South
Elevation**

Telegraph Hill



Sansome St.



Building Elevations

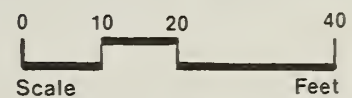
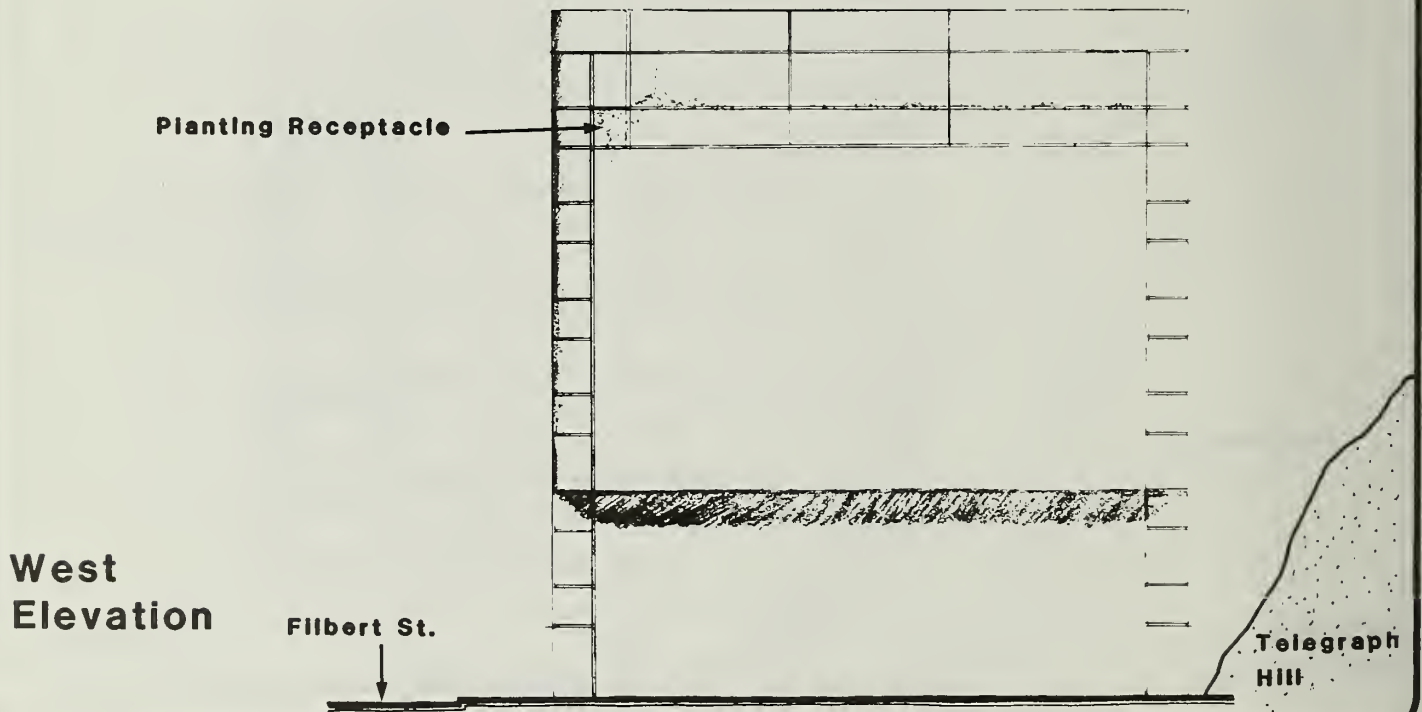
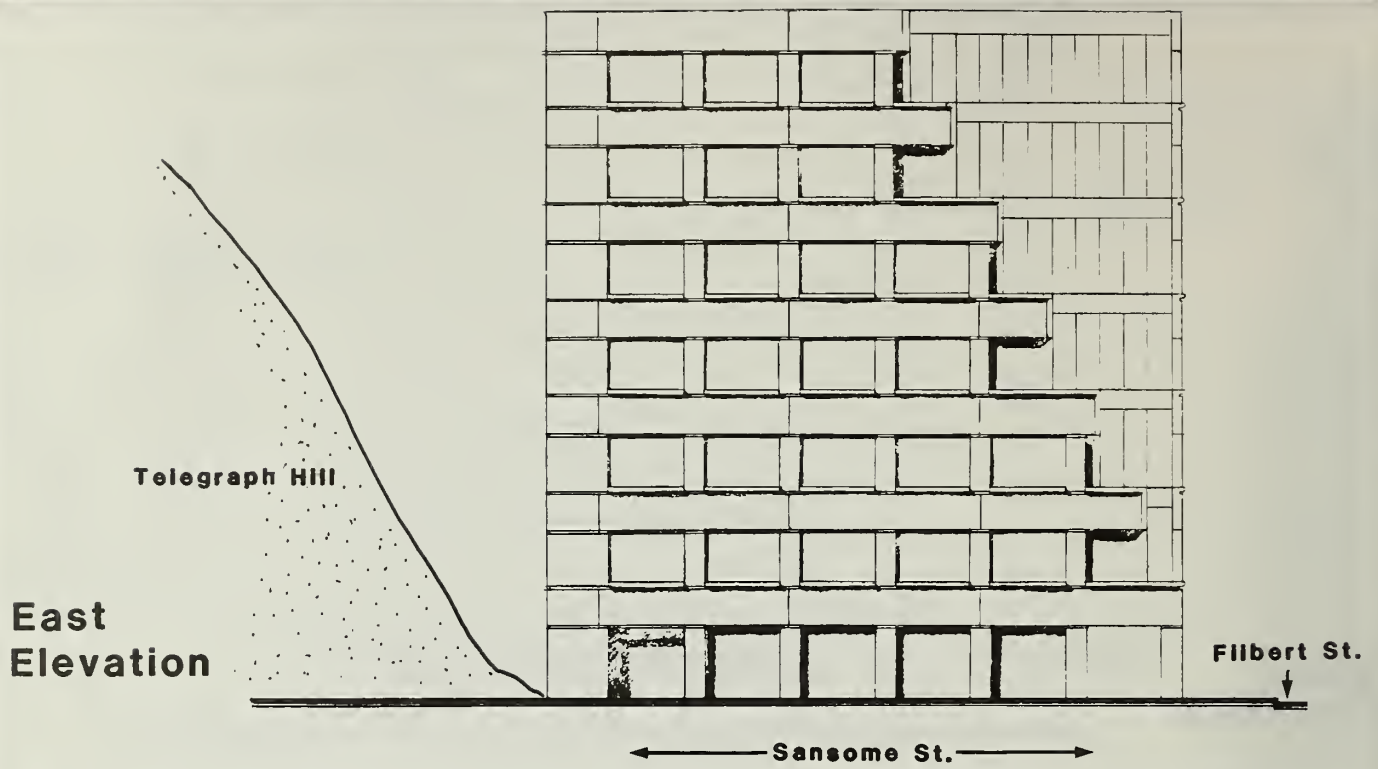
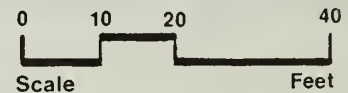


Figure No. 7

Source: H.O.K. Associates



Building Elevations



Source: H.O.K. Associates

Figure No. 8

II. ENVIRONMENTAL SETTING

A. SITE CHARACTERISTICS

I. Land Use Activities and Construction

The project site is part of a larger area characteristically referred to as the Base of Telegraph Hill. The area extends along the waterfront from Broadway on the south to Bay Street on the north. The project site is within the proposed Northern Waterfront Historic District (Figure 2, page 9).

Excluding Levi's Plaza, a seven-block, mixed use development located on the southern part of the base of Telegraph Hill, only one major building, Master Charge, has been built in recent years. It occupies an entire block at Front and Vallejo Streets. Most of the other buildings in the area occupy one-half block or less. North of Union Street, new construction in recent years has been limited to the Telegraph Landing condominiums in the block bounded by Montgomery, Chestnut, Sansome and Lombard Streets, and Wharf Plaza rental housing at Francisco and Kearny Streets.

To the northeast of the project site, at the corner of Lombard and Battery Streets, is the Merchants Ice House, which has been converted to office use. A separate garage, recently constructed west of the Merchants Ice House, provides parking for about 200 cars.

A two-story concrete warehouse on the half block south of the Merchants Ice House has been converted to a private sports club. North of the Telegraph Landing block are the recently renovated buildings of the Fibreboard Corporation, Western Contract Furnishers, and Victoria Station restaurant chain offices, and the newly built Francisco Bay office complex on Port Authority land, fronting The Embarcadero. A restaurant is located on the triangular parcel opposite the foot of Pier 27. Levi's Plaza, north and east of the

project site, is currently under construction and comprises seven blocks including office, retail, residential and parking land uses. Central to the design plans for the office complex is a landscaped pedestrian plaza on the closure of Filbert Street between Sansome Street and The Embarcadero. The office structures partially enclose the plaza, with main building entrances oriented toward it.

A three-level parking structure containing space for 825 cars is being constructed at Sansome and Lombard Streets as part of the Levi's Plaza complex (Block F, Figure 2, page 9). Each level would contain approximately 80,000 square feet, for an approximate total of 265,000 square feet of parking space. Commercial shops, totalling approximately 5,000 square feet, would be located at street level along Sansome Street. The parking structure serves as a base (podium) for the construction of two buildings, one of nine levels and the other of four levels, containing 202 condominium dwellings and having approximately 221,000 square feet of gross floor area. The uncovered roof of the parking structure would be landscaped with trees, shrubs, and walkways.

The project site is zoned C-2, Community Business District (see Section I.D., page 12, Zoning and Project Design Characteristics) and lies also within the Northern Waterfront Special Use District No. 3 (Figure 2, page 9).¹ Development in the area is subject to the general provisions outlined in the City Planning Code for C-2 districts, but these may be superceded by additional regulations imposed by the provisions of the Special Use District. The Special Use District also permits industrial and commercial operations directly relating to water-borne commerce and wholesale establishments within an enclosed building.

The west boundary of the project site joins the Telegraph Hill area, which is under different zoning restrictions, as shown in Figure 2, page 9. The two-block area surrounding Coit Tower is zoned P (Public Use), which applies to land that is owned by a government agency and is in some form of public use, including open space. Remaining areas west of the site on Telegraph Hill above the site are zoned RH-3 with dwelling structures and nonindustrial public buildings the principal permitted uses.

2. Project Relationship to Telegraph Hill

- The project site lies at the eastern base of Telegraph Hill adjacent to Sansome Street. The site is within an area of the Hill that was quarried during the late 1800s for sea wall construction and Bay fill. As a result of the quarry operations, the south and west margins of the site are defined by steep slopes of exposed bedrock (see Section III. B., Impacts, Geology and Soils, page 44). Multiple and single family detached dwelling units are located on Telegraph Hill above the project site, with principal pedestrian access to Sansome Street provided by a series of stairways known as the Filbert Street steps, terminating adjacent the loading dock of the existing structure within the Filbert Street right-of-way. Because of the steep slopes of Telegraph Hill, roadways for vehicle access to Sansome Street on the east side of the Hill have never been constructed. However, Filbert Street extends for about 100 feet from Sansome Street to the base of the Hill along the north property line of the site. Filbert Street extending between Sansome Street and The Embarcadero was closed in 1980 to allow the construction of the Levi's Plaza complex of buildings and parks.

¹On 19 January 1977 the San Francisco City Planning Commission adopted Resolution 7643, which amended the Master Plan of the City and County of San Francisco to include The Plan for the Northeastern Waterfront and to delete the previously adopted Northern Waterfront Plan. The new plan encompasses an area from Fisherman's Wharf to North China Basin; it was formulated to guide future development of the area in a manner consistent with the interests of San Francisco and achieve conformity with Special Area Plan No. 1: San Francisco Waterfront, prepared and adopted by the San Francisco Bay Conservation and Development Commission in 1975, as an amendment to its San Francisco Bay Plan.

B. URBAN DESIGN

I. Visual Aspects

The base of Telegraph Hill area historically has been used primarily for warehouses since the mid-1800s. As port activities have declined in recent years, old warehouse buildings have been converted to office, restaurant and retail uses. Some buildings have been demolished to make way for new projects such as Levi's Plaza (see Section II.A, Site Characteristics, page 18) and other land has been converted to open-air parking lots.

Streets once paved with granite cobbles have been resurfaced with asphalt paving. Portions of railroad spurs extending from the Belt Line tracks paralleling The Embarcadero extend throughout the project area, and are no longer used. Telephone and electric lines supported on wooden poles follow the grid pattern of the streets.

The project site lies at a point of transition between the residential development atop Telegraph Hill and the mixed commercial and residential development which characterizes the Levi's Plaza project below. From the top of Telegraph Hill, a network of steps, boardwalk-sidewalks and wooden landings (the Filbert Street steps) convey the pedestrian from the pavement of Montgomery Street above to the paved end of Filbert Street abutting the quarried rock face of the Hill below. The slopes are developed with a variety of predominantly low, small-scaled, individualized residences, with trees interspersed, and bounded by manicured gardens.

The site is highly visible, permitting visual orientation to persons near the base of Telegraph Hill from the open space within the Levi's Plaza project, The Embarcadero, and from Sansome and Battery Streets. Within the project area, Telegraph Hill, because of its proximity, mass and height of 275 feet, tends to orient sightlines north-to-south along the Hill's base and east toward the waterfront. From the intersection of Battery and Filbert Streets, Coit Tower is visually prominent on top of Telegraph Hill, and pier structures adjoining The Embarcadero are visible from many locations.

2. Historic District

- The area of the northern waterfront containing the project site is a candidate for designation as a historic district because of the warehouse character of the area marked by structures dating in age from the Gold Rush to mid 20th century. With the destruction of the North Point Warehouse in 1969, it was felt that some action was needed to preserve what was left of San Francisco's earliest waterfront structures.

On March 3, 1976, the Landmarks Preservation Advisory Board¹ adopted a resolution of intent to designate the area bounded by Broadway, Lombard, The Embarcadero, and the base of Telegraph Hill, including the project site, as a historic district. In September, 1981, the Board toured the proposed historic district and affirmed its interest in preserving a historic district in the area and directed its staff to continue work on the proposal.² As of March 17, 1982, the Board adjusted the proposed boundaries of the historic district to include the area bounded by Broadway, Union, Sansome and the Embarcadero, including the base of Telegraph Hill area north of Union Street encompassing the project site and the Walters Warehouse (Figure 2, page 9).² If the area were to become a historic district, the Landmarks Board would act on permit applications for

demolition, new construction, additions, alterations, or exterior changes visible from a public place or thoroughfare on property within the historic district. To date, the Jackson Square Historic district (an enclave of buildings that escaped the 1906 fire) and the Webster Street Historic District are the only two such districts that have been established in San Francisco by the Board of Supervisors.

The existing structure on the project site is not considered by the Landmarks Board to be an architecturally or historically contributing building in the proposed historic district.³ However, two buildings within the project area have been noted by the Landmarks Board for their architectural and historic significance and which are being renovated as part of the Levi's Plaza Project. They are the Italian Swiss Colony Building on the corner of Greenwich and Battery Streets, and the Cargo West Building on the corner of Union and Battery Streets.² Both of these buildings have been designated as landmarks by the San Francisco Board of Supervisors.⁴

¹ Established by the City Planning Commission and the Board of Supervisors to act in an advisory capacity to preserve historic, architectural, and aesthetic landmarks.

² Jonathan Malone, San Francisco Department of City Planning, Secretary to the Landmarks Preservation Advisory Board, telephone conversation, April 9, 1982.

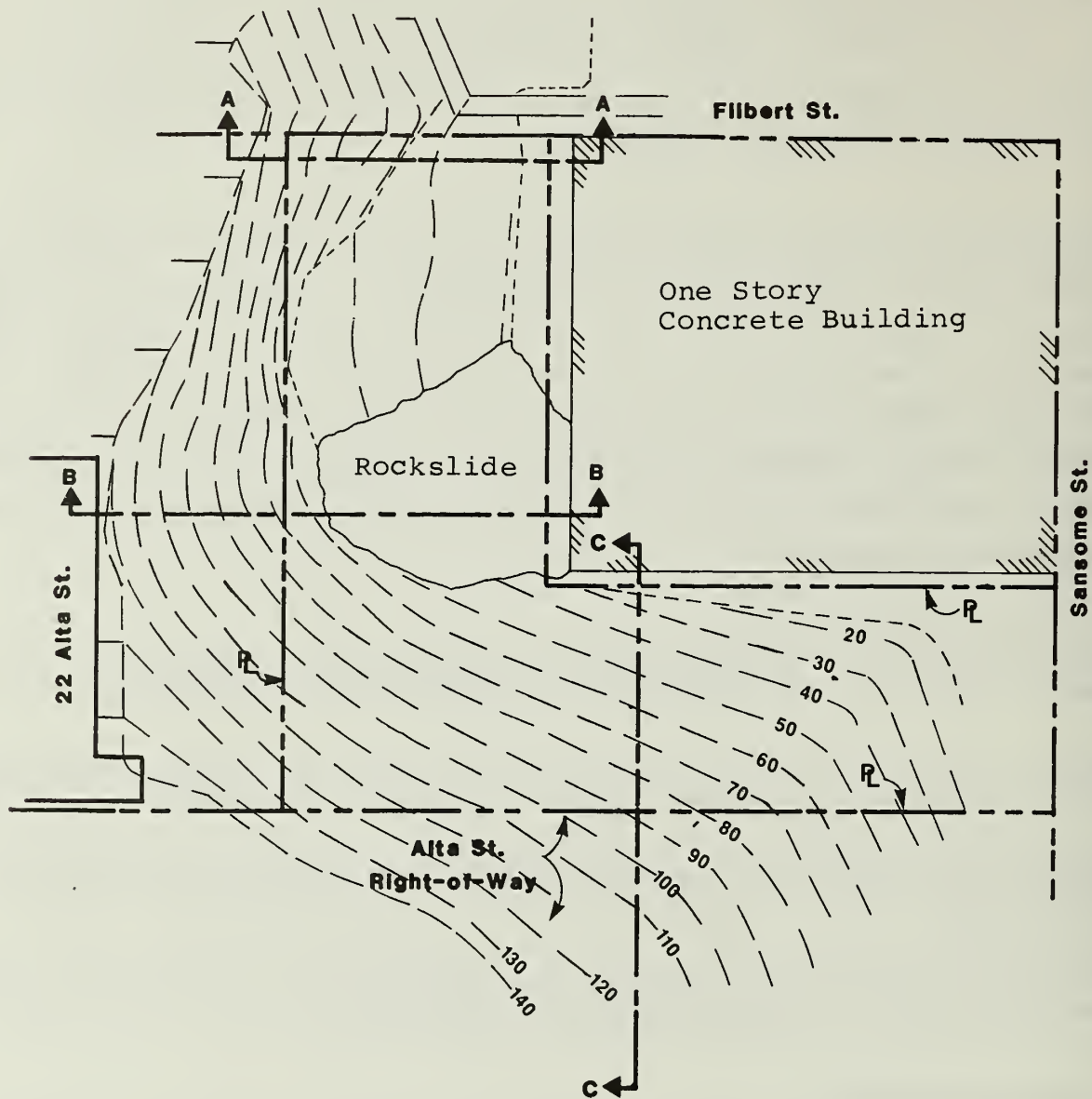
³ Minutes of the Regular Meeting of the Landmarks Preservation Advisory Board, July 1, 1981, page five.

⁴ Italian Swiss Colony Building, Landmark No. 102, designated January 8, 1978. Cargo West Building, Landmark No. 104, designated April 23, 1979.


C. GEOLOGY AND SOILS


The project site is located within the area that was quarried from Telegraph Hill in the late 1800s for the production of rock to be used as fill in the San Francisco waterfront. The quarry operations produced the steep bedrock faces visible today along the north waterfront, which are of the Franciscan Complex, consisting of fractured and sheared sandstone, siltstone and shale.¹

The project site is level at approximately +12 feet San Francisco Datum.² Adjacent rock slopes south and west of the project site are between 100 and 140 feet high having inclinations between 1/2:1 (horizontal to vertical distance) to 3/4:1 horizontal to vertical distance), with localized vertical and overhanging sections. Figure 9, page 23, illustrates contours of the elevation for the slopes adjacent to the site; cross-sections through the site at three locations are shown in Figure 10, page 24.¹ The cross-sections show the

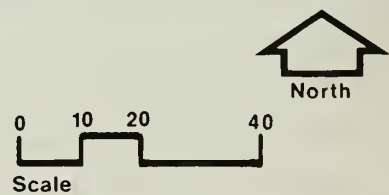


LEGEND:

 C Denotes section through site.
See Figure 10.

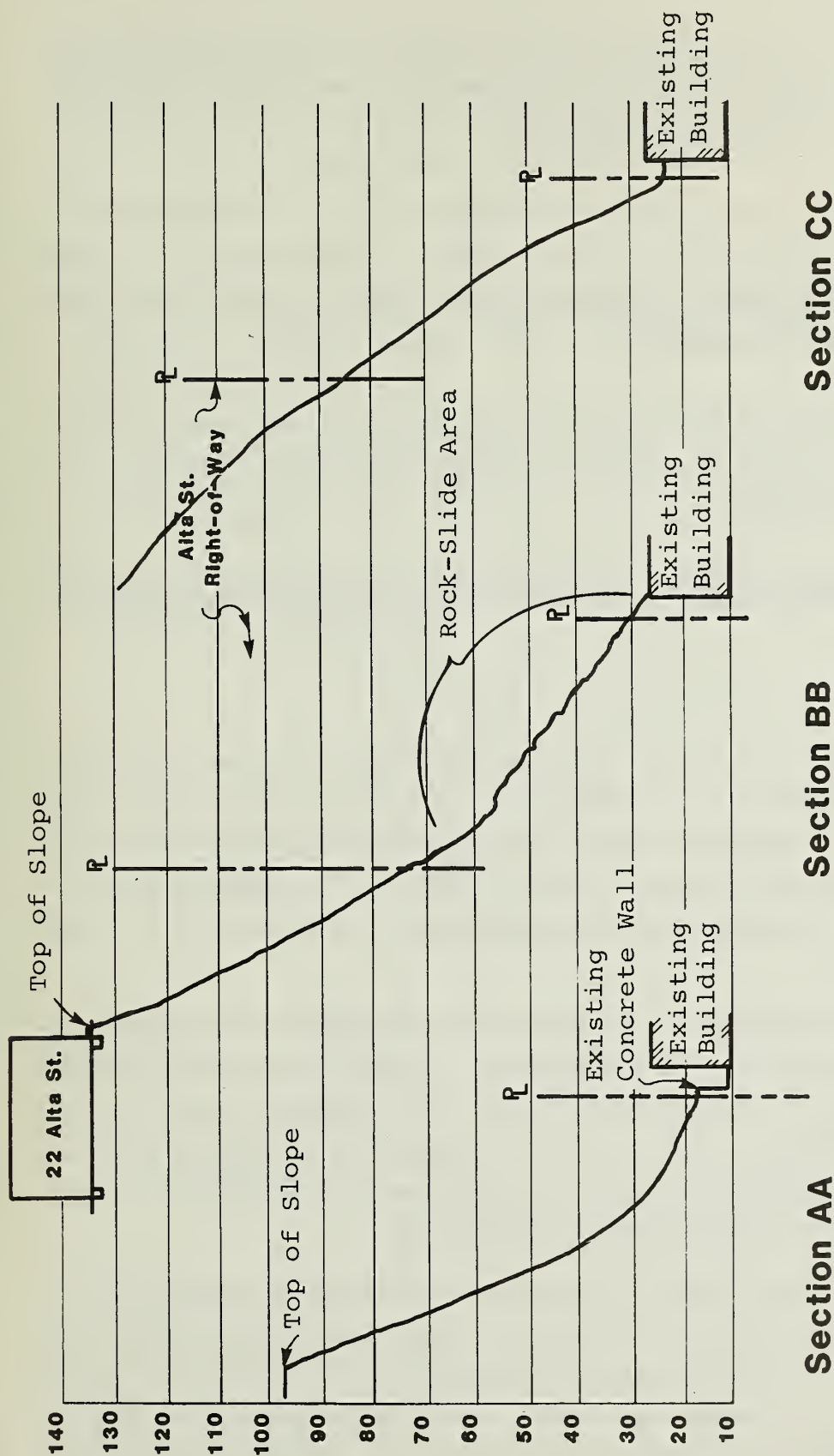
 P.L. Property Line.

Site Topography



Source: Dames & Moore

Figure No. 9



R: Property Line.

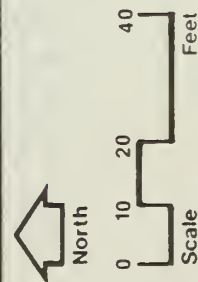


Figure No.10

Source: Dames & Moore

slopes of Telegraph Hill and the vertical and horizontal distance relationships between the existing building on the project site and the structure at 22 Alta Street, which is the structure on Telegraph Hill closest to the project site.

Shallow exploration pits dug at the rear of the existing structure on the site revealed a thin layer (less than two feet thick) of rocky soil, underlain by sandstone. Debris from rock falls and slides originating on neighboring properties has accumulated on the southwest corner of the existing building.¹

A large proportion of the Telegraph Hill quarry slopes has remained stable over the last 80 to 100 years. Many of the slopes show little or no evidence of rockfalls or slides. Other slopes have a history of instability.

A review of recent historic rockfalls or slides in the Telegraph Hill area disclosed the following.¹

- In 1967 a movement of surficial soil and weathered rock undermined a portion of the residential structure at 22 Alta Street, directly west of the project site. Remedial actions included excavating to construct piers to underpin the structure and application of gunite to protect slope surfaces.³ This slope protection is easily visible from Sansome Street near the project site and appears to have been effective.
- A slope movement occurred in 1971 several blocks northwest of the project site between Telegraph Hill Boulevard and Winthrop Street. The movement involved tens of thousands of cubic yards of rock and necessitated the temporary abandonment of several residences above the slopes. The slopes were stabilized by a program that included removal of loose rock debris, constructing a retaining wall, and installation of permanent drainage facilities.
- The slide above Sansome Street on the Union Street right-of-way about one block south of the project site has been active over a long period of time, with the most recent activity occurring in January 1978 and January 1979. The most recent failure consisted of a wedge-shaped slide. Debris was removed from Sansome Street and a reinforced, tied-back restraining fence was constructed in 1979 along Sansome Street by the City.

II. Environmental Setting

Observations of the base of Telegraph Hill and of the faces of the hill reveal areas of loose rock and soil which can be expected to slide naturally in the future and in a similar manner to that described in the previous paragraphs.⁴

¹Wood, W.C., Dames & Moore Associates, Geotechnical Consultation, 1299 Sansome Street, San Francisco, March 17, 1982. This document is available for inspection at the Department of City Planning, Office of Environmental Review, 45 Hyde Street, San Francisco, CA, 94102.

²San Francisco Datum is approximately 8.6 feet above mean sea level.

³Gunite: A mixture of cement, sand and water applied to a surface through a hose under hydraulic pressure.

⁴Wood, W.C., Dames & Moore Associates, Geotechnical Consultation, 1299 Sansome Street, San Francisco, November 24, 1981, page 2. This document is available for inspection at OER (see above).

III. ENVIRONMENTAL IMPACTS

INTRODUCTION

An Initial Study of the proposed project was published on March 19, 1982, and a determination was made that an Environmental Impact Report was required. Issues that were considered to require no further discussion as a result of the Initial Study include: Land use compatibility, noise, public services and utilities, water and energy resources, transportation and parking, air quality, wind, biology, population and housing, and cultural and historic resources. (Please refer to the Initial Study contained in the Appendix, page A-1).

A. URBAN DESIGN

I. Design

Citing Telegraph Hill as an "Outstanding and Unique Area" which contributes in a remarkable way to the visual form and image of the City, the Urban Design Plan, an element of the Comprehensive Plan of the City of San Francisco¹, sets out principles and policies for the guidance of new major development (footnotes are shown on page 41). In addition, the Plan for the Northeastern Waterfront contains general objectives and policies to be applied to the entire waterfront and more specific policies for the base of Telegraph Hill area.² Policies relevant to the proposed project which are contained in the Urban Design Plan and Plan for the Northeastern Waterfront are set forth below respectively:

Policies from the Urban Design Plan

City Pattern Policy 1: "Recognize and protect major views in the City with particular attention to those of open space and water. Overlooks and other viewpoints for appreciation of the City and its environs should be protected and supplemented by limitation of buildings and other obstructions where necessary and by establishment of new viewpoints at key locations."¹

- Policies from the Northeastern Waterfront Plan Base of Telegraph Hill Area, Objective 3, Policy 2: "Avoid the blockage of private and public views and maintain sightlines between the waterfront and Telegraph Hill.²"

The proposed structure would rise 84 feet to the top of the parapet which would rise 2½ feet above the roof.³ The 84-foot height is measured by the project architects from the curb of Sansome Street which bounds the east margin of the site. The building height permitted by the Planning Code would be measured at the curb at midpoint of the Sansome Street frontage. The top of the structure would be 1½ feet below the permitted 84-foot height limit. All mechanical equipment including elevator drive mechanisms would be contained within the building's interior; no mechanical penthouses would be constructed on the roof.

Figures 11-17, pages 30-36, depict how views near the project site would be affected by the proposed building. From Observer Point 1 on Telegraph Hill (Figure 12, page 31), views of the Levi's Plaza structure at Sansome and Union Streets would be partially obstructed, as well as portions of the sky. Views toward the Bay would not be obstructed by the proposed building due to the presence of other structures in the area which block views to the east from Observer Point 1 on the Filbert Street steps.

Higher on the steps (Observer Points 2 and 3), Figure 13, page 32, the structure would continue to obstruct views to the Levi's Plaza building, but would not block views to the Bay, Bay Bridge or San Francisco skyline in the background. This would also be true from Observer Point 4 (Figure 14, page 33). Some of the plant materials on Telegraph Hill that would screen views of the structure are deciduous and lose their foliage in the winter; therefore, during winter months, views of the proposed structure would be more pronounced than during the summer months from various locations on Telegraph Hill when all plant materials would be in full foliage.

As shown in Figures 12, 13 and 14, views of the project would vary with respect to observer location on the hill and the amount of foreground foliage at each observer location which would screen the structure. From a visual standpoint, the project would extend the area development pattern closer to Telegraph Hill, becoming a foreground element to views of the hill from area locations (Figures 15, 15a, 16, 16a, 17 and 17a, pages 34, 34a, 35, 35a, 36 and 36a). The building would block views of the existing exposed slopes of Telegraph Hill as viewed from The Embarcadero, Levi's Plaza (Figure 17a) and by travelers along Sansome Street (Figures 15a and 16a).

Policies from the Urban Design Plan

Major New Development Policy 6: "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction."¹

Principles for Major New Development Policy 4: "The relationship between areas of low, fine-scaled buildings and areas of high, large-scaled buildings can be made more pleasing if the transition in building height and mass between such areas is gradual."¹

Policies from the Northeastern Waterfront Plan

Base of Telegraph Hill Area Objective 3: "To develop a diversity of additional activities which would strengthen the existing predominant uses in the base of Telegraph Hill area and activities which would expand the period of use, but of an intensity which would provide a relief from the adjacent downtown and Fisherman's Wharf areas."²

Urban Design Policy 1: "Preserve the physical form of the waterfront and reinforce San Francisco's distinctive hill form by maintaining low structures near the water, with an increase in vertical development near hills or the downtown core area."²

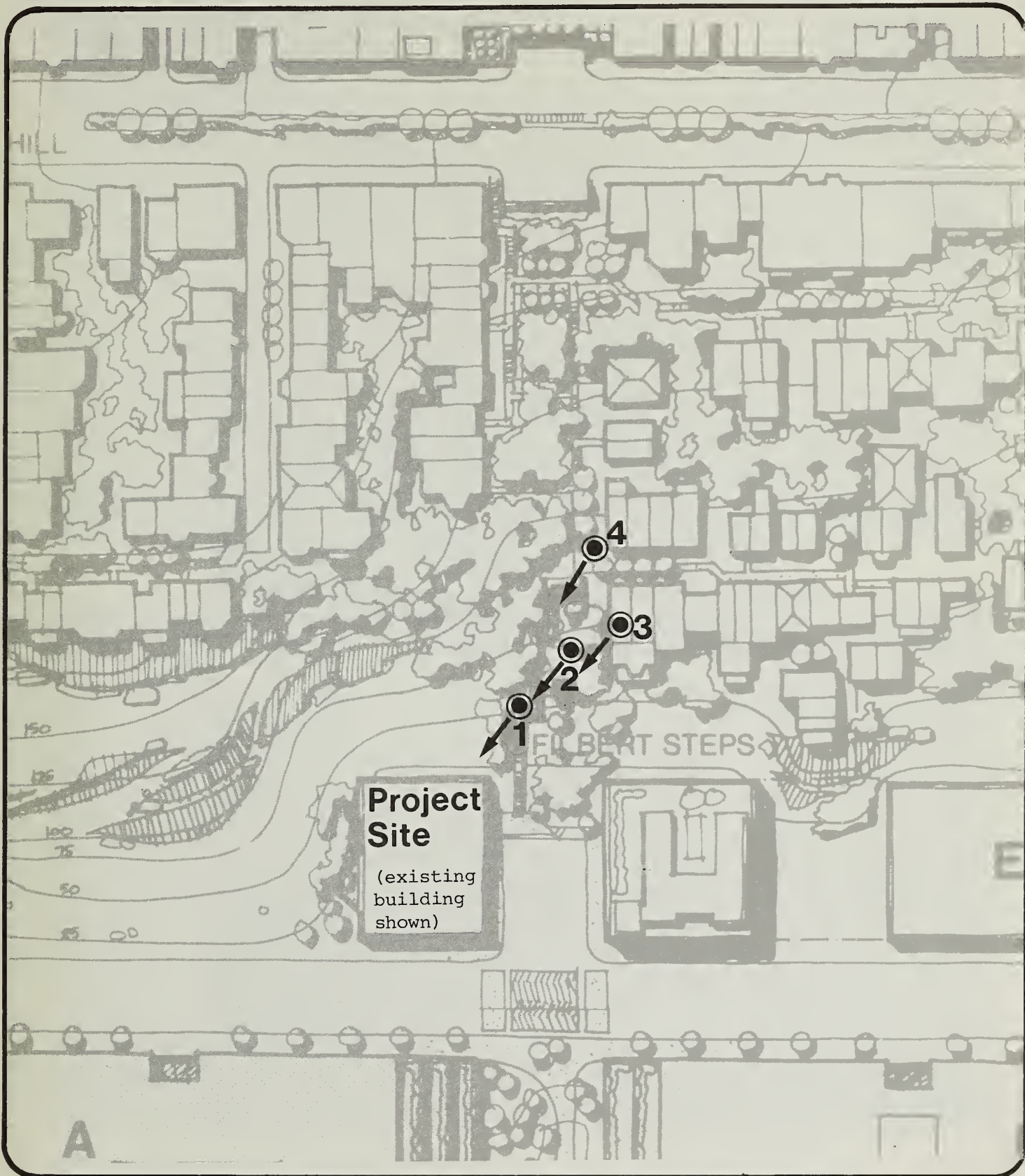
Urban Design Policy 2: "Preserve and create view corridors which can link the City and the Bay."²

Urban Design Policy 32: "Conceal any mechanical equipment, pipes, ducts and antennas, on roof surfaces. Avoid shiny or highly polished materials on roof surfaces and facades."²

Base of Telegraph Hill Area, Objective 3, Policy 6: "Encourage the provision of landscaping and publicly accessible open space in new development in the Base of Telegraph Hill area."²

Base of Telegraph Hill Area, Objective 5: "To develop the area in such a way as to preserve and enhance the physical form of the waterfront and Telegraph Hill, and to preserve views from the hill."²

The proposed project would conform to City Pattern Policy I Major New Development Policy 6, and Principles for Major New Development 4 of the Urban Design Plan and Objective 3 and 5 and the General Urban Design Policies of the Northeastern Waterfront Plan in terms of diversity, intensity and scale of land use. These issues are basically urban design issues and are concerned with the overall image or character of the base of Telegraph Hill area.



Observer Point Locations (See Figures 12, 13 and 14)

Source: H.O.K. Associates

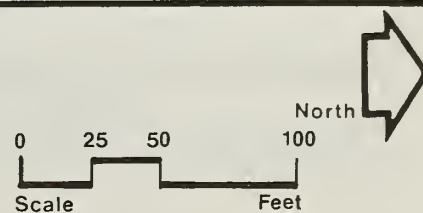


Figure No.11



View from landing at midpoint of Filbert Street steps.

Photomontage: Building Viewed from Observer Point 1

Source: H.O.K. Associates

Figure No.12



View from upper landing of Filbert Street steps.



View from residence below intersection of Filbert Street steps and Napier Lane.

Photomontage: Building Viewed from Observer Points 2 and 3

Source: H.O.K. Associates

Figure No. 13



View from residence above intersection of Filbert Street steps and Napier Lane.

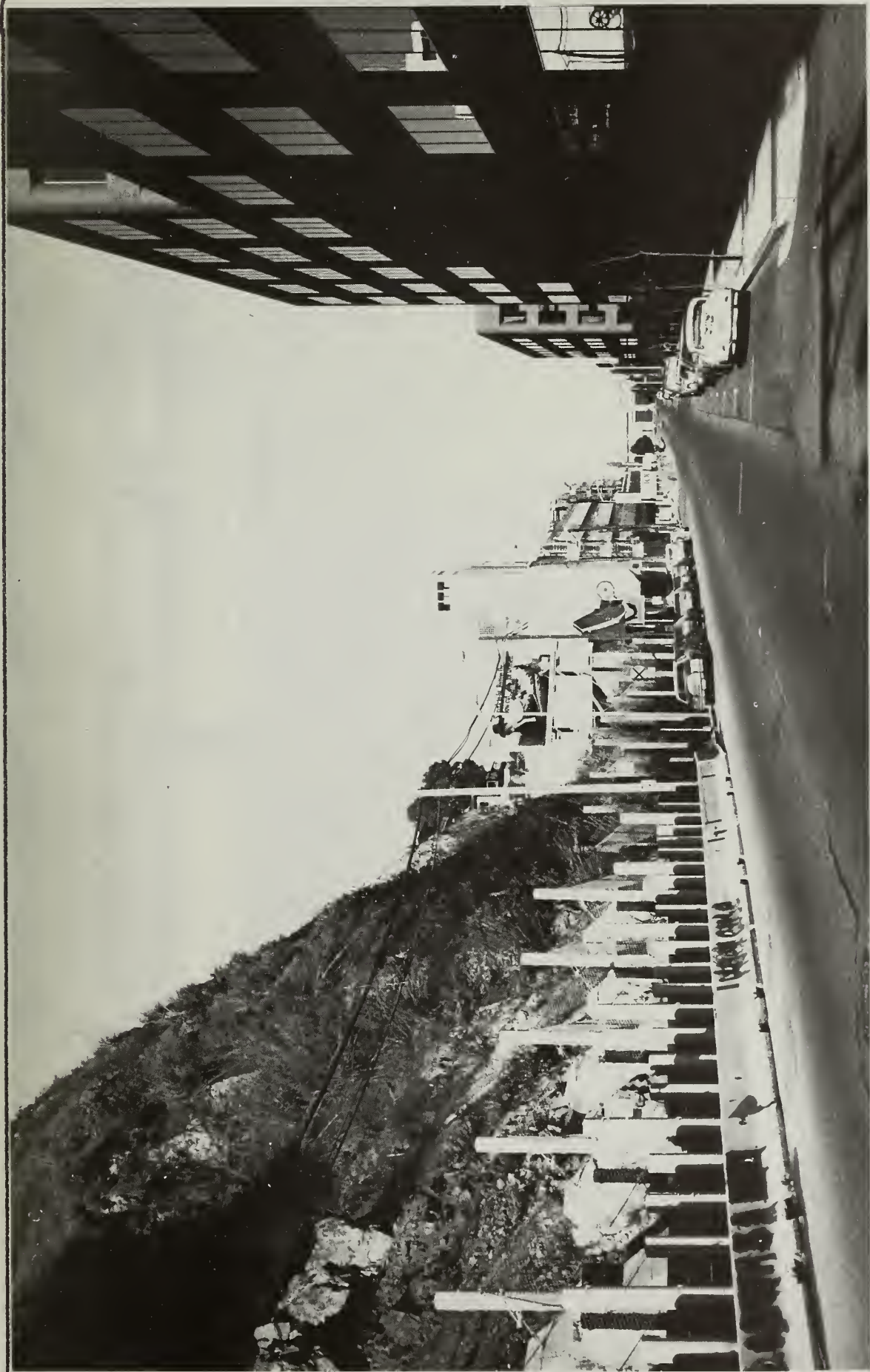


View from Levi's Plaza at Battery Street.

Photomontage: Building Viewed from Observer Points 4 and 5

Source: H.O.K. Associates

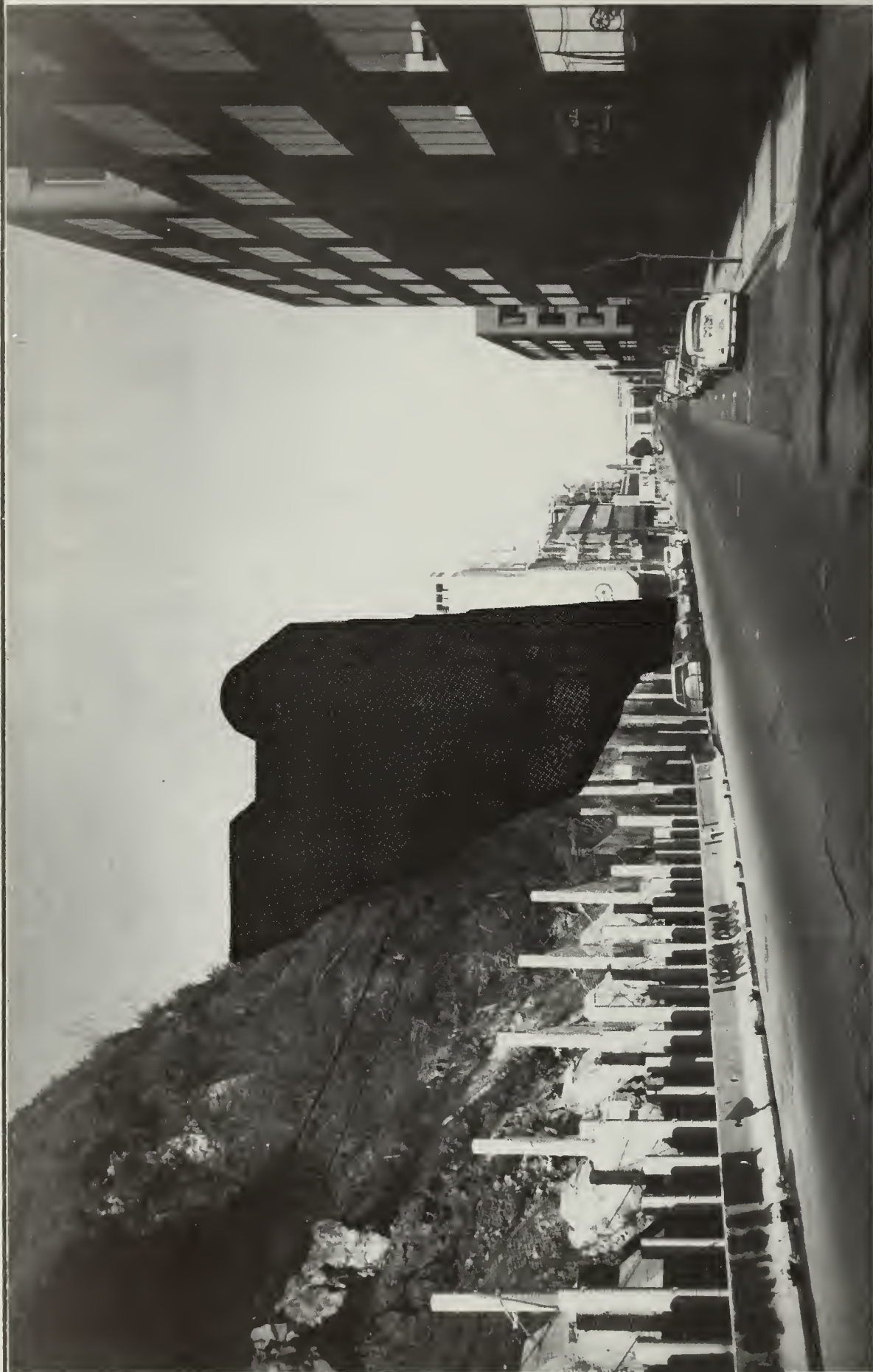
Figure No. 14



Project Site Viewed: from Corner of Sansome and Union Streets

●Figure No.15

SOURCE: H.O.K. Associates



Photomontage: Building Viewed from Corner of Sansome and Union Streets

● Figure No.15a

SOURCE: H.O.K. Associates



Project Site Viewed: from Corner of Sansome and Greenwich Streets

●Figure No.16

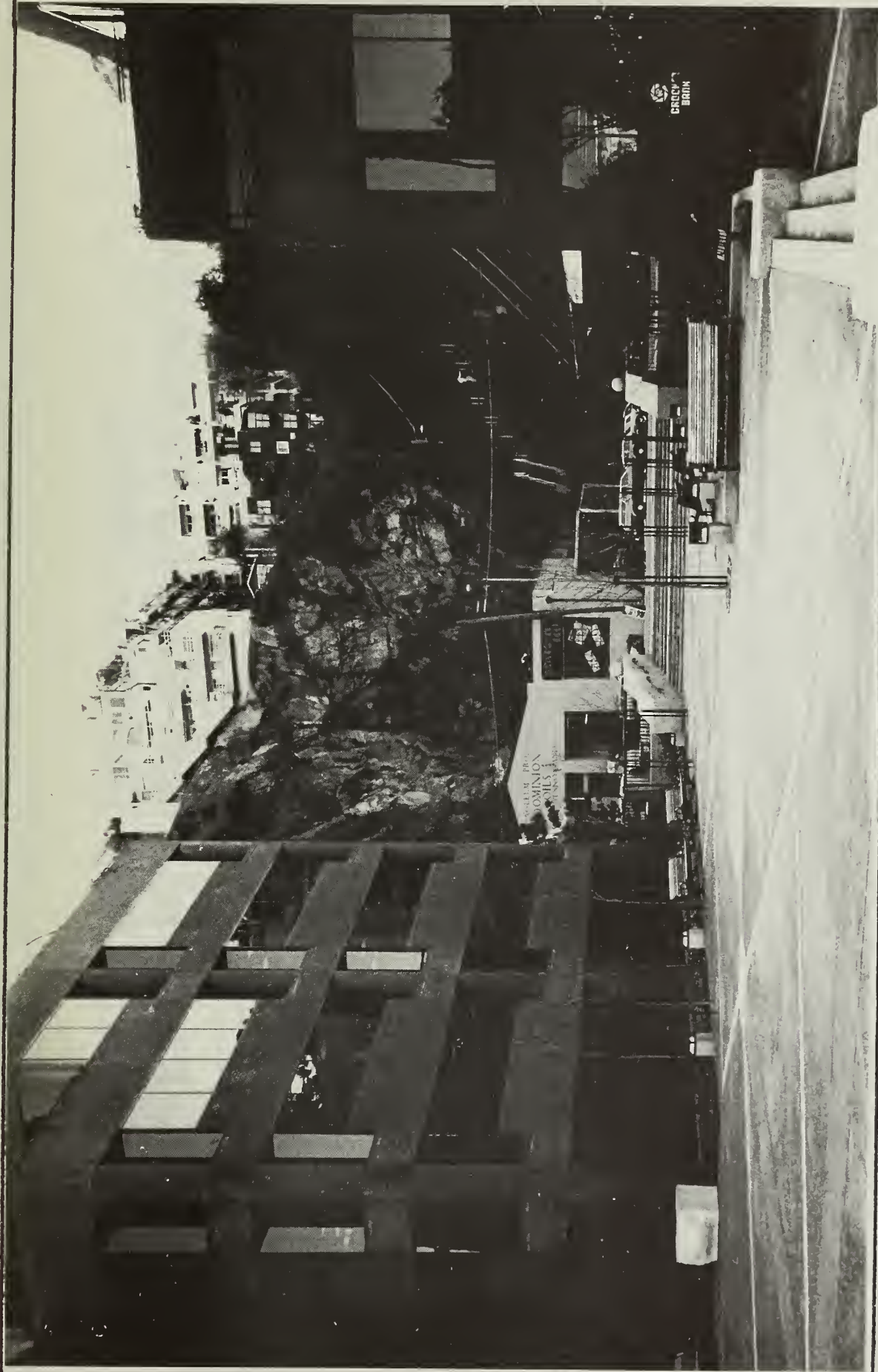
SOURCE: H.O.K. Associates



Photomontage: Building Viewed from Corner of Sansome and Greenwich Streets

● Figure No.16a

SOURCE: H.O.K. Associates



Project Site Viewed: from Levi's Plaza Near Sansome Street

● Figure No.17

SOURCE: H.O.K. Associates



Photomontage: Building Viewed from Levi's Plaza Near Sansome Street

●Figure No.17a

SOURCE: H.O.K. Associates

The proposed project would not add a land use that is unique to the area, but would replace past retail use of the site with office use. Office use in the area would therefore be strengthened. The structure would be less in gross square feet than the buildings opposite the site (Levi's Plaza) along the east side of Sansome Street but about equal in Floor Area Ratio. The structure would be equal in height to the building at the northeast corner of Sansome and Union Streets, two stories higher than the building at the southeast corner of Sansome and Greenwich Streets and five stories less in height than the residential condominium structure under construction at the southwest corner of Lombard and Sansome Streets. The structure would be about equal in length and width to the Walter's warehouse and penthouse opposite the site on the north side of Filbert Street, about 30 to 40 feet taller than the warehouse portion of the building and about as high as the smaller penthouse which rises above the warehouse. The project may therefore be viewed as a structure of less bulk than most surrounding buildings, while increasing the intensity of land use at the base of Telegraph Hill. The terraced northeast face of the proposed building may serve as a reiteration of the stepped facades of the buildings on Telegraph Hill and as a visual transition.

Conservation Policy 6 of the Urban Design Plan: "Respect the character of older development nearby in the design of new buildings."¹

Conservation Policy 7: "Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character."¹

Major New Development Policy 2: "Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance."¹

The visual form and character of the project area near the Base of Telegraph Hill has been modified and currently is being modified by the construction of Levi's Plaza, encompassing a seven-block area (Figure 2, page 9). Office buildings constructed along Sansome Street east of the project site have been surfaced with red-brown brick tiles respecting the characteristic brick construction of the preserved Cargo West Building, the Italian Swiss Colony Building, and other older structures south of Union Street such as the renovated Ice House at the southeast corner of Union and Sansome Streets.

As expressed by the project architects, the proposed structure is being designed to complement rather than repeat or visually compete with the office buildings and spaces of Levi's Plaza and the garage and condominium structures at Sansome and Lombard Streets.⁴

- At the regular meeting of the Landmarks Preservation Advisory Board on July 1, 1981, during a presentation of the project by representatives of the project sponsor, it was noted by a Board member that "the area is being built up with a great deal of brick, and that another material would be refreshing."⁵

The building's exterior walls would be fabricated from precast concrete panels with the windows set in from the building's outer walls visually defining the spandrels⁶ on the north, east and south sides of the building (Figures 6 and 7, pages 15 and 16). Shadows cast by the spandrels would emphasize the presence of windows on the building's south and east-facing walls. The concrete surfaces would be sandblasted to create a texture similar to the stucco surfaces of the existing structure and portions of the Walters' warehouse and penthouse opposite the site on Filbert Street (Figure 3, page 10). The concrete would contain a light buff or beige color similar to the light earth-tone colors of the rock faces of Telegraph Hill bordering the south and west margins of the site. The use of concrete would visually relate to the concrete surfaces of the garage and condominium towers at Lombard and Sansome Streets. The roof of the structure would be surfaced with a light buff colored gravel to complement the color of exterior portions of the building.

The major design feature of the building would be the horizontally terraced, stepped building wall originating at the second level and extending to the roofline (Figure 5, page 14). The terraced and stepped back building wall would orient toward the intersection of Filbert and Sansome Streets), allowing building occupants views of the Levi's Plaza courtyard, portions of the Bay beyond, and buildings along Sansome Street north of the project site. The terraced wall would reflect the ascending form of Telegraph Hill adjacent the project site, would contain shrubby plant materials installed in planters built into the terraces, serve to reduce the apparent mass and scale of the structure, and emphasize the intersection of Sansome and Filbert Streets. When viewed from Sansome Street and Levi's Plaza, the terraced building wall, in its progressively stepped-back configuration, would visually provide a transition to the steep, ascending form of Telegraph Hill. These design features would address Conservation Policy 6 and

Major New Development Policy 2 of the Urban Design Plan. The building would block existing views of the hill and would not address Conservation Policy 7 of the City's Urban Design Plan.

- Windows of the structure would be a light-grey tinted glass, similar to the grey tinted glass of the Levi's Plaza office buildings, set in grey aluminum window frames. Excluding the terraced, stepped back building wall where it would join with the adjacent walls, the corners of the building would be rounded, repeating the rounded building corners of the Levi's Plaza office buildings. The structure's west-facing wall would contain a planting receptacle at the sixth floor level constructed between the rounded building corners (Figure 8 page 17) for the installation of vines to cover the building side for views from Telegraph Hill residents. The west-facing building wall would project five feet outward at the third floor level (Figure 7, page 16) to coincide with the west property line and would contain no windows to avoid direct night light transmission towards neighboring residences. Incandescent lights (electrical lamps with standard light bulbs) would be used in office spaces behind the terraced building wall described above to maintain a "residential" appearance to light that would emanate from that portion of the structure avoiding light and glare to neighboring properties; fluorescent light that would completely fill offices with light behind the terraced building wall would not be used. All other windows would be fitted with narrow-slat Venetian (Levelor) blinds. Lights in interior spaces would automatically be turned off at night when office spaces would not be in use to avoid point sources of light or potential glare from interfering with views from residents above the building on Telegraph Hill, occupants of the Walters' Warehouse penthouse and Telegraph Landing condominiums. Because the building's terraced wall would orient to the northeast, generally away from the sun, and because all windows would be positioned vertically, the structure would not generate sunlight glare on adjacent residential units. It is not anticipated that nighttime light reflections from nearby light sources would significantly affect nearby residences.

Policy 6 of the Base of Telegraph Hill Subarea, Northeastern Waterfront Plan: "Encourage the provision of landscaping and publicly accessible open space in new development in the base of Telegraph Hill area."²

City Pattern Policy 7 of the Urban Design Plan: "Recognize the natural boundaries of districts and promote connections between districts."¹

- City Pattern Policy 4 of the Urban Design Plan: "Protect and promote large-scale landscaping and open space that define districts and topography."¹

As the project site is rather small (7,200 gross square feet), the proposed building would occupy the full lot area as does the structure which currently occupies the site. Public open space would not be removed from the project area nor is any proposed as a result of the project. Street trees would be provided along the front of the building along Sansome Street. The section of Filbert Street adjacent the project site between Sansome Street and Telegraph Hill would be planted with street trees and parking spaces would be restriped to serve the needs of project visitors and area residents. The lower landing of the Filbert Street steps (linking Filbert Street to Montgomery Street) would be relocated several feet to a location to be determined within the Filbert Street right-of-way for uninterrupted use to accommodate construction of the building. The existing earthen bank near the foot of the Filbert Street steps would be planted with flowering shrubs.

The final location of the Filbert Street steps landing and design details of the landing are yet to be determined by the project sponsor (see Section IV.A., Mitigation, Urban Design, page 46).

¹San Francisco Department of City Planning, Urban Design Plan, adopted by Resolution 6745 of the San Francisco City Planning Commission, August 26, 1971, pages 10, 25, 33, 37, 25, 36, and 42.

²San Francisco Department of City Planning, Northeastern Waterfront Plan, The Comprehensive Plan of the City and County of San Francisco, pages 19, 24, 30 and 31.

³Parapet: a low wall extending around the perimeter of a roof.

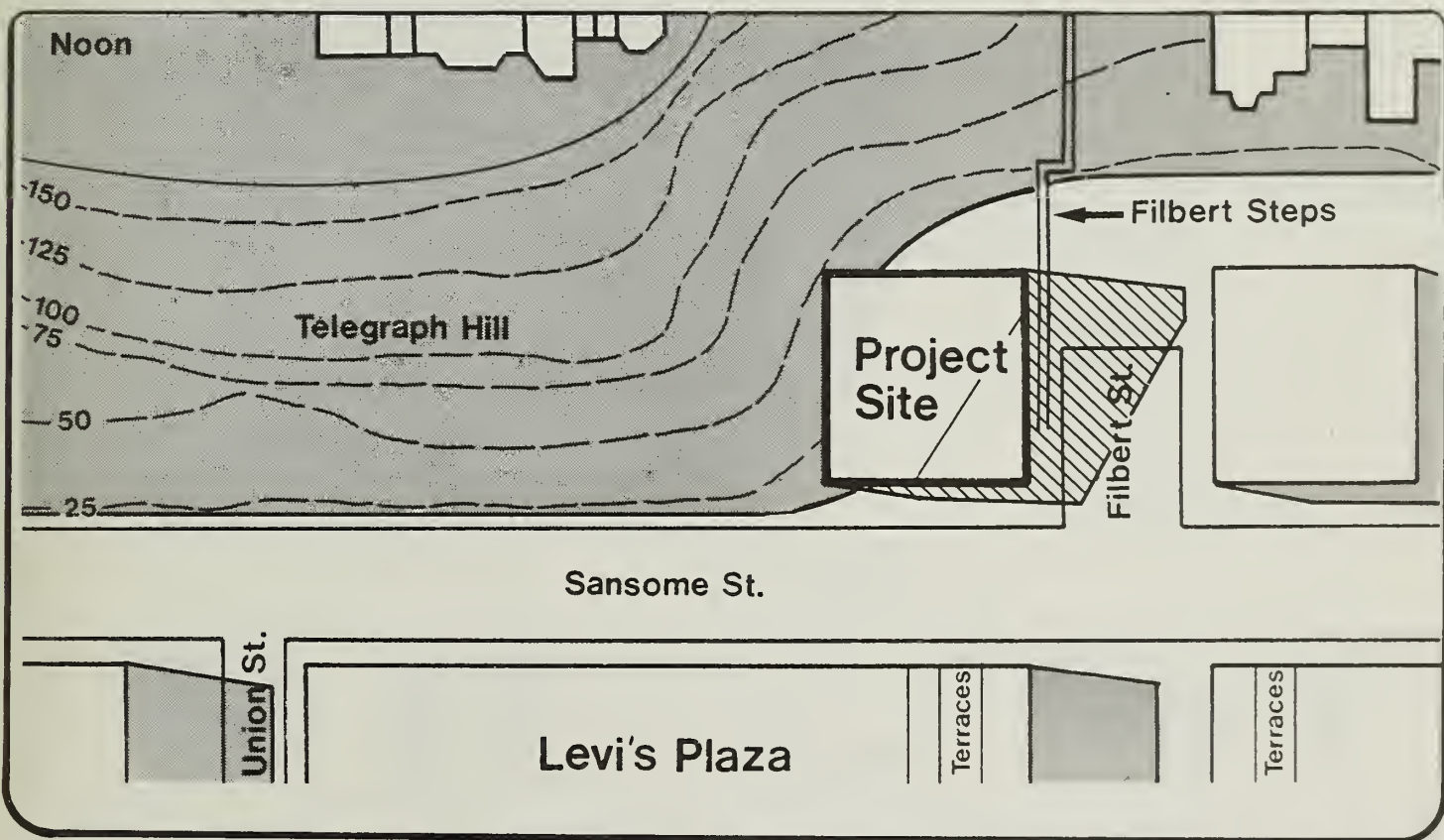
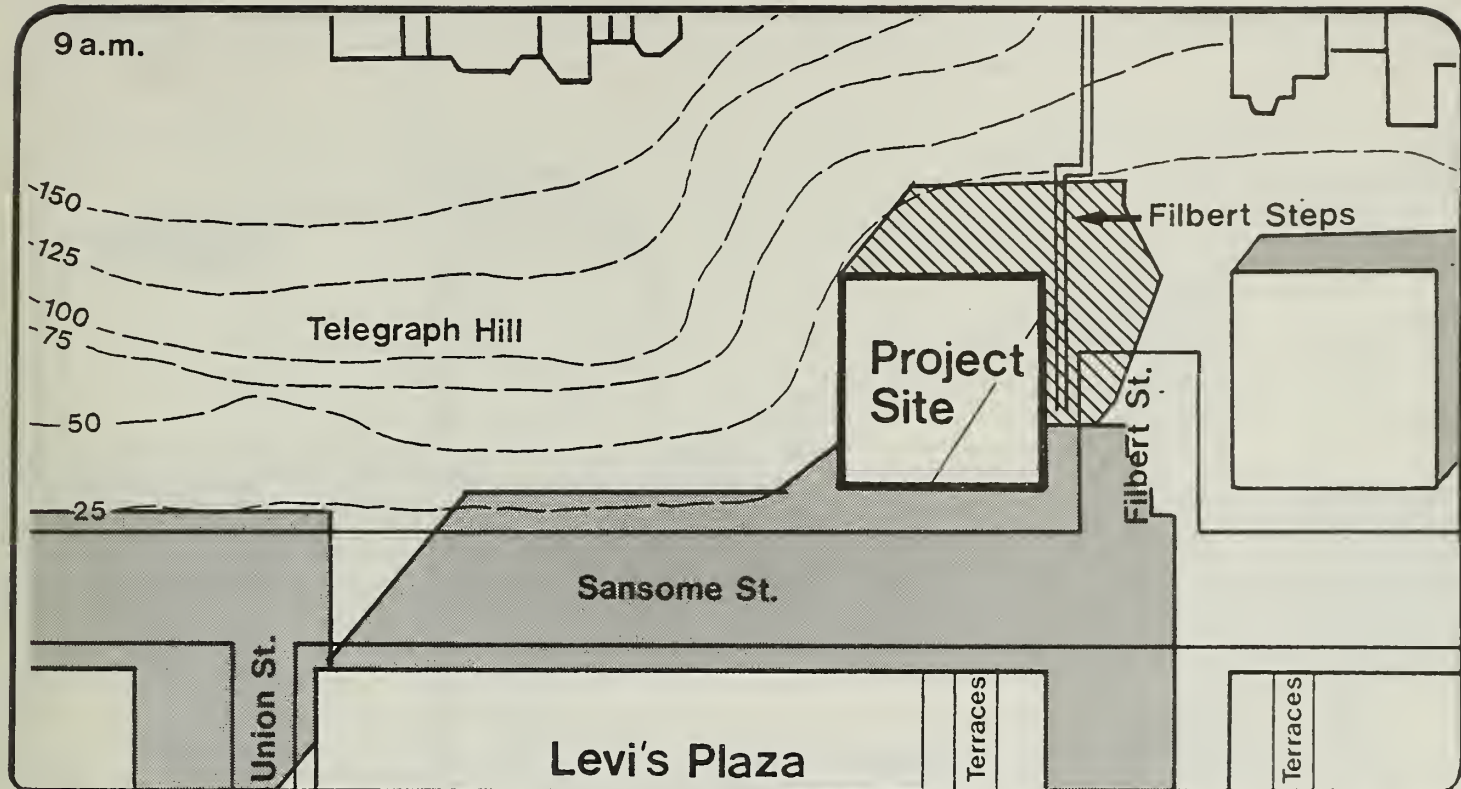
⁴Memorandum to EIP Corporation from HOK Associates, Bob Canfield, project architect, October 22, 1981.

⁵Landmarks Preservation Advisory Board, Minutes of the Regular Meeting, July 1, 1981, Mr. Choy.



⁶Spandrel: In a multi-story building, a panel-like area between the top of a window on one level and the sill (base) of a window in the story above.

2. Shadows

Figures 18, 19 and 20, pages 41, 42, and 43, indicate shadow patterns the proposed structure would project during various portions of the year. The analysis is for periods when the sun would be lowest in the sky (December 21), through the period in which the



Shadow Patterns-March/September

-  Existing Shadows
-  Shadows Added by Proposed Project

SOURCE: EIP Corporation

0 25 50 100
Scale Feet

North

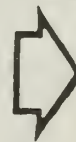
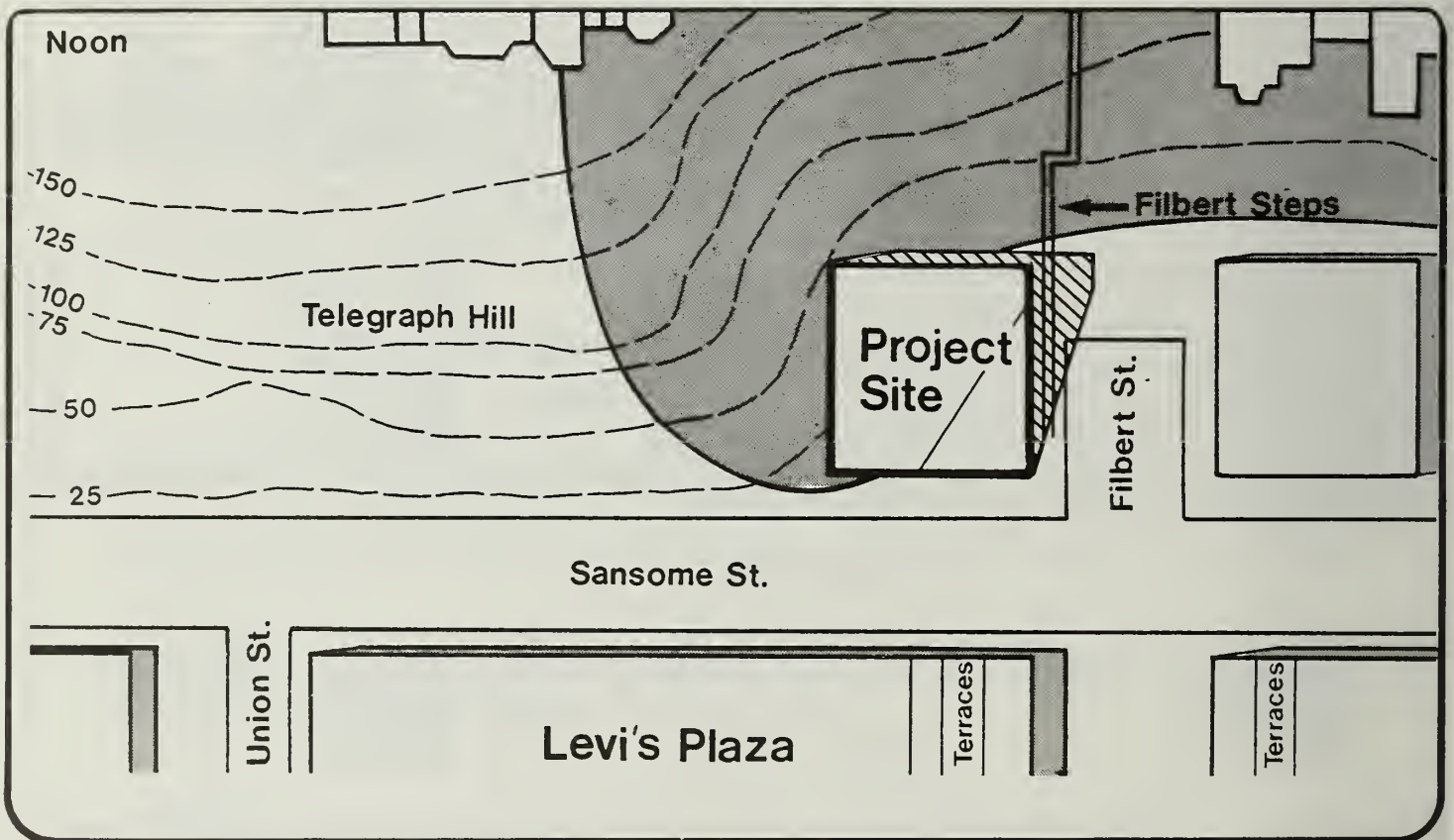
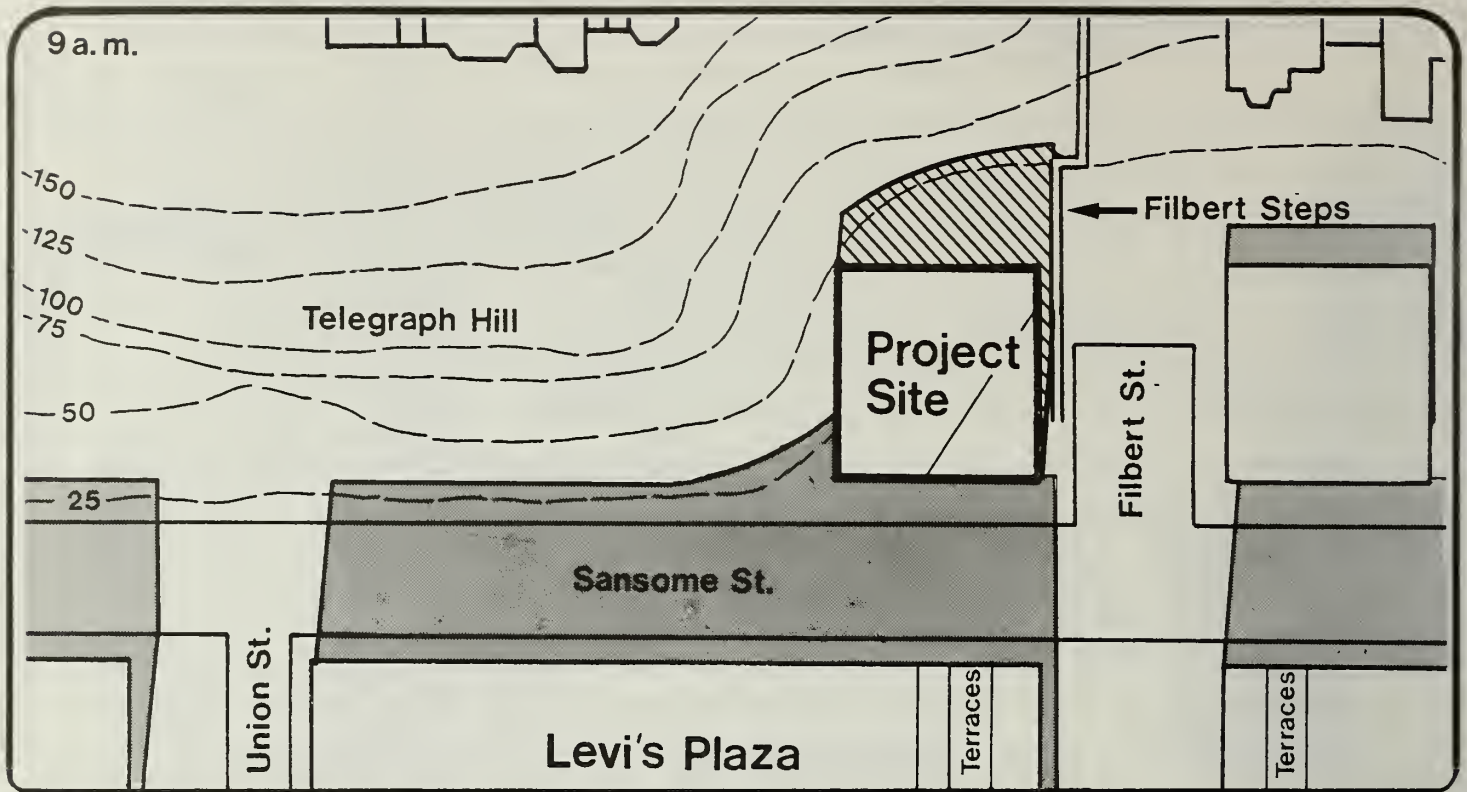


Figure No.18



Shadow Patterns-June

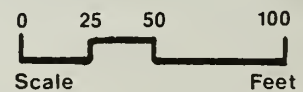


Existing Shadows



Shadows Added by Proposed Project

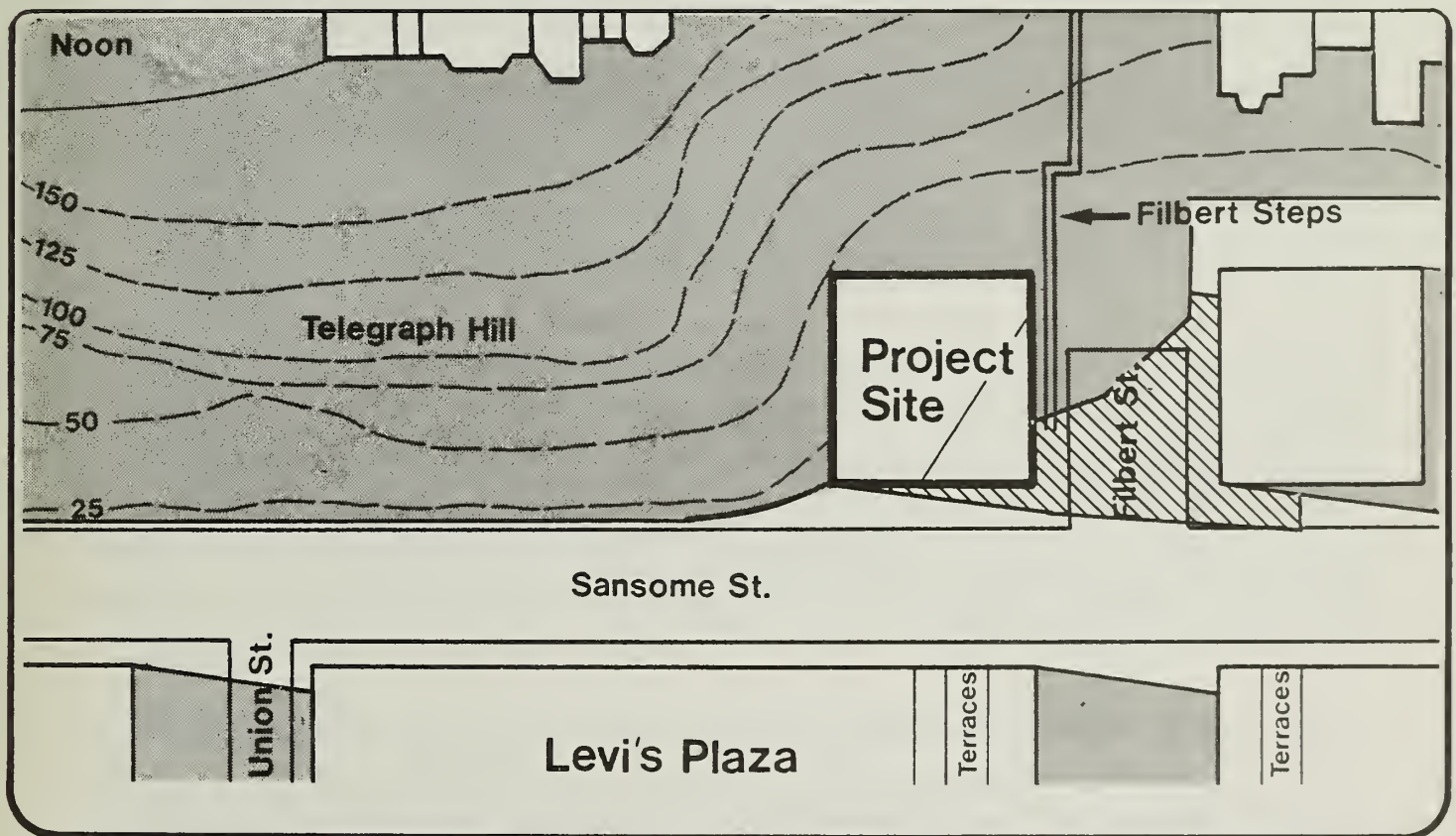
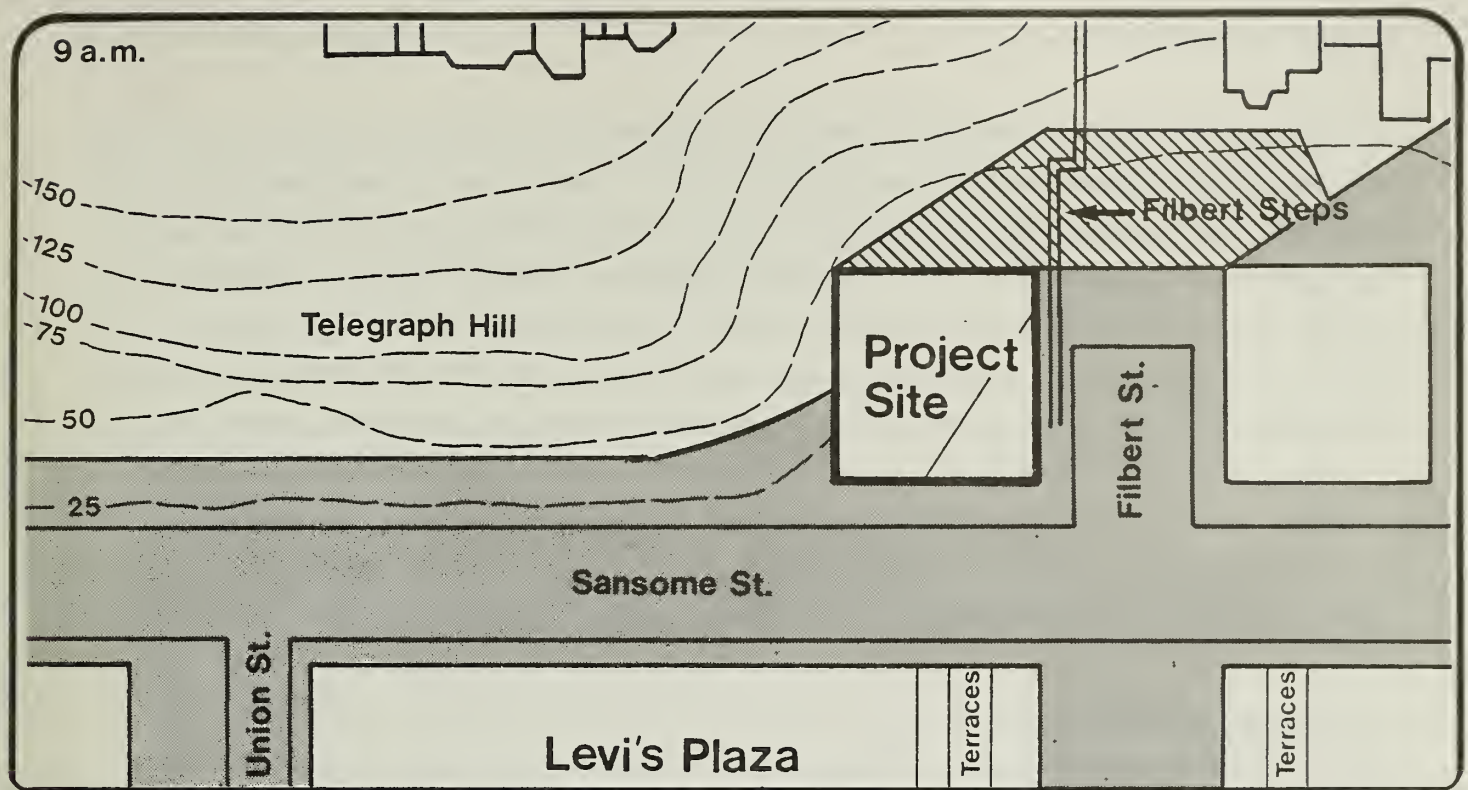
SOURCE: EIP Corporation





North



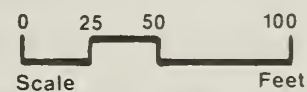
Figure No. 19



Shadow Patterns-December

-  Existing Shadows
-  Shadows Added by Proposed Project

SOURCE: EIP Corporation



North



Figure No. 20

sun would be highest in the sky (June 21). The times of analysis are 9 a.m. and 12 noon wherein the proposed building would cast maximum and minimum shadows, respectively. At 4 p.m. the project would be within the shadow cast by Telegraph Hill in all seasons. At 9 a.m. during spring, fall and winter, the project would cast a shadow across the lower portion of the Filbert Street steps, but would not cast a shadow across the steps at 9 a.m. in summer. At 12 noon during the spring, summer and fall, the building would cast a shadow across the landing of the steps at Filbert Street; the steps would be within the shadow cast by Telegraph Hill at 12 noon during the winter, and would also be within the shadow of the hill during afternoon periods during other portions of the year. The proposed project would not cast shadows on the gardens of Telegraph Hill planted and maintained by local residents.

B. GEOLOGY AND SOILS

The existing structure on the site would be demolished prior to construction of the proposed structure. During demolition, front-end loaders would be used to knock down walls, remove the existing floor and load debris into trucks for disposal. The floor of the proposed structure would be constructed about three feet below the level of the existing building. Therefore, about 1,300 cubic yards (up to 3,500 tons) of rock debris would be excavated to bring the site to the proposed grade, including the removal of accumulated rockfall material from the southwest corner of the site adjacent the quarried slopes.

Site excavation would be done using bulldozers and pneumatic hammers to rip, excavate and break up the rock. Dump trucks would be used to remove the broken-up rock from the site for disposal at a landfill site yet to be selected. The vibrations from excavation and construction would be of less duration than occurred when Levi's Plaza was constructed across Sansome Street from the project site. The level of vibrations experienced on adjacent properties during project construction would be about the same as during construction for Levi's Plaza.²

Excavation of bedrock and drilling into the bedrock are not expected to disturb or fracture the rock formation, except at the local point of digging, which is within the project site boundary. Vibrations during site excavation and drilling would not jeopardize the stability of Telegraph Hill.² However, the vibrations and construction activity could cause loose rock and soil to fall or ravel.² These rockfalls and ravellings can be expected to be of the same magnitude and nature as that which has previously occurred on this portion of the slope in the past. No piledriving or drilling of tiebacks or supports into adjacent properties for building construction is planned.¹ Blasting with explosives for site excavation will not be done.

Excavation in the western portion of the project site would require special procedures due to the presence of rocky debris and the likelihood of additional rockfalls during construction (see Section IV. Mitigation, page 46). Existing rock debris buildup is greatest in the southwest corner of the site and future rockfalls are most probable at that location.

No dewatering is planned for the site, since no excavation would take place below the water table. After construction, the project would not impose loads or vibrations on slopes or adjacent features.¹

The most probable seismic-induced hazard that would affect the proposed project is landsliding. Since the site is on bedrock, there is no danger of liquefaction or subsidence. The site is not crossed by any active fault and is four feet above the predicted tsunami runup for the 500-year flood at high tide. During a sufficiently strong earthquake, rock or boulders could be shaken from portions of Telegraph Hill's slopes, but the specific location of probable slope failures is difficult to predict accurately.

The possibility of damage to the proposed building, once constructed, from future slope instability indicates a need for protective construction. Such construction would include a freestanding catchment wall to catch and retain rockfall, and structurally strengthened building walls to absorb the energy of rockfalls without affecting the performance of the building. Catchment wall design would include provisions for withstanding a gradual buildup of rockfall debris; withstanding the impact of rockfalls; allowing sufficient height to prevent rocks from bounding over the wall; a sufficient setback from the building to allow wall deflection without building damage; and sufficient foundation support systems¹ (see Section IV. Mitigation, page 46). The proposed building would be constructed on reinforced concrete footings extending about 12 inches into the bedrock below the first floor. The catchment wall would probably be supported on drilled piers, in lieu of a spread footing, depending on actual subsurface rock conditions pending further site investigations.²

¹Wood, W.C., Dames and Moore Associates, Geotechnical Consultation, 1299 Sansome Street, San Francisco, March 22, 1982.

²Wood, W.C., Dames and Moore Associates, Report, Geotechnical Consultation, 1299 Sansome Street, San Francisco, October 30, 1981.

IV. MITIGATION

A. URBAN DESIGN

Proposed as Part of the Project

1. Street trees would be provided along Sansome and Filbert Streets in front of the building.
2. The northeast corner of the building would be terraced inward from the second floor to the roof to avoid obstructing views to the Bay from residents of Telegraph Hill near the Filbert Street steps. In addition, no rooftop mechanical penthouse would be constructed; all mechanical equipment would be housed within the building's interior to improve rooftop appearances. The terraces would be designed to accommodate thick plantings which would complement the Filbert Street Steps. Final landscape plans would be approved by the Department of City Planning.
3. The existing earthen bank near the foot of the Filbert Street steps would be planted with flowering shrubs.
4. The project sponsor would, in cooperation with representatives of the Department of City Planning and interested members of the community, prepare and pay for a mutually acceptable design and pay for improvements to the public area associated with the terminus of the Filbert Street steps within the Filbert Street right-of-way adjacent the project site.

B. GEOLOGY AND SOILS

Because rock debris buildup is greatest at the southwest corner of the site and future rockfalls are most likely at that location, special shoring and excavation procedures would be required during construction. Accordingly, a structural engineer would be engaged to design the shoring and to work with the construction contractor on rock excavation and construction procedures. It may be determined possible to incorporate the shoring members into the permanent catchment wall planned for the southwest portion of the site.²

To mitigate the damaging effect of falling rock and rocky debris from adjacent uphill properties, the proposed building would be protected by an impact barrier separated from the building. The barrier would rise about 20 feet above the finished floor level; it would be an engineered structure, to limit the effect of falling debris, and to protect the building tenants.² Construction details would include the following:

- For the south property line, the exterior building wall would be strengthened with heavily reinforced concrete extending 40 feet from the southwest corner and to at least 40 feet above the existing grade; no windows would be permitted within this zone.
- For the west property line a 20-foot high, freestanding, specially reinforced concrete catchment wall would be installed at the southwest corner of the property; exterior building walls would be strengthened similar to the building wall along the south property line to a height of at least 40 feet.
- For the foundation design, spread footings would be founded in rock, extending at least 12 inches below the adjacent grade, designed to bear total loads (including dead, live, settlement, lateral and seismic loads), and overlain by a properly drained ground floor slab. Footing excavation would be inspected by a qualified engineer or geologist prior to placement of reinforcing steel. If localized deeper weathering or softer rock is encountered, appropriate adjustments to footing widths would be made.

Catchment walls to restrain rockfalls, conforming with the San Francisco Building Code (which includes the required seismic design elements for minimizing seismic hazards from groundshaking), have been incorporated in previous structures along the base of Telegraph Hill.³ The design of the proposed catchment wall is described in a geotechnical report recently prepared for the project, as well as seismic safety design features of the building foundation and structure.²

The project sponsor would retain a licensed soils engineer who would report to the Department of City Planning, to survey and document the present geologic condition of the portion of the Telegraph Hill slope which could reasonably be affected by project construction during worst-case conditions. The consultant would monitor construction activities during all phases of site preparation and construction of the catchment wall. The consultant would check all sensitive areas of the Hill slope to observe any signs of potential damage to nearby structures and would authorize any necessary preventative

measures or remedial actions to repair damaged Hill stability or structures. The cost of all preventative measures or repairs would be borne by the project sponsor.

The structure would be designed to meet the seismic design standards of the Uniform Building Code (UBC) and the Structural Engineers Association of California (SEAOC). The latter design standards relate structural design to the maximum probable earthquake in the region, an 8.3 Richter magnitude event along the San Andreas Fault.

To reduce seismic hazard, nonstructural elements such as hanging light fixtures, hung ceilings, wall partitions, bookcases and mechanical equipment would be firmly attached to prevent them from falling during an earthquake, as required by the San Francisco Building Code. Emergency procedures would be posted.

In order to remove seepage water or runoff accumulating beneath the structure, the ground floor slab should be provided with an underdrain system of perforated pipes and a six-inch thick layer of permeable material draining to a sump. Drain rock and perforated pipe also would be provided behind the walls or retaining structures bearing against the hill slopes.²

¹Wood, W.C., Dames & Moore Associates, Geotechnical Consultation, 1299 Sansome Street, San Francisco, March 22, 1982.

²Wood, W.C., Dames & Moore Associates, Report, Geotechnical Consultation, 1299 Sansome Street, San Francisco, October 7, 1981.

³Department of City Planning, Final EIR, Levi's Plaza, EE 77.256, San Francisco, certified December 14, 1978, Vol. 1, page 176.

V. ALTERNATIVES

A. NO-PROJECT ALTERNATIVE

If the proposed project were not constructed, the project site would remain in its current condition and the existing building would remain vacant until the structure would either be demolished or leased for warehousing or sales uses. This condition would occur for an unspecified period of time during which time none of the urban design impacts would occur. The no-project alternative would hold open future options for the project site to be developed under the design scenarios as described below.

B. PLANNING CODE DESIGN ALTERNATIVE

While the proposed structure contains a Floor Area Ratio (FAR) of 6.18:1 under the existing zoning code which allows a FAR of 6.25:1 (see Section I.D., Zoning and Project Design Characteristics, page 12), ultimate build-out of the site would allow a structure of equal height, length and width, with no setbacks at the northeast building corner. Such a structure would block views to portions of the Levi's Plaza building opposite the project site fronting Sansome Street from residential structures on Telegraph Hill above the project site and from the Filbert Street steps. The building would not recognize or orient toward the intersection of Filbert and Sansome Streets and there would be increased shadows cast along the north side of the building. The structure would assume the shape of a cube, if built, strictly according to code and would lack visual interest. Blockage of views of the Bay from the lower portions of the Filbert Street steps would conflict with City Pattern Policy I of the Urban Design Plan.

C. SHORTER BUILDING ALTERNATIVE

A shorter building on the project site would permit more view area of the Levi's Plaza building opposite the project site fronting Sansome Street than the project as proposed

from residential structures on Telegraph Hill and from the Filbert Street steps. The relative increase in view area would depend on the actual building height constructed and whether or not the structure would contain setbacks at the northeast building corner.

- A lower structure, such as a 4-story building containing a 3:1 FAR, (Figure 20a, 20b, and 20c), would create a building of less bulk than the building as proposed. A lower structure would also permit more view area of the quarried rock faces of Telegraph Hill adjacent the project site and would cast less shadow area north of the site. Preservation of the view of the Telegraph Hill rock face and outcroppings would better address Conservation Policy 7 of the Urban Design Plan than would the project as proposed. A shorter building is not being proposed by the project sponsor because of the small size of the site (7,200 square feet) and the need for adequate office space for future expansion of the occupying firms (see Section I.C., Project Use and Design, page 12).

D. ALTERNATIVE SITE USES

Since the project site was purchased in March 1981, two alternative uses of the site have been considered: commercial and residential. Due to the immediately adjacent Levi's Plaza project which incorporates commercial facilities within it (shops, banks, restaurants), the project sponsor decided that exclusive commercial use of the project site would not be necessary or needed because the demand for commercial space in the project area would have been fulfilled by the commercial facilities of Levi's Plaza.

Condominium housing also was considered and rejected. Over 400 units of condominium/rental housing are under development by the project sponsor team within a 2½ block radius of the project site including about 200 upper middle income units at the corner of Lombard and Sansome Streets and about 225 moderate income units at Wharf Plaza I and II located at Francisco and Kearny Streets. The project sponsor believes that this fulfills the demand for upper middle income housing for the area. The sponsor believes that a mixed use in the area including offices as well as commercial is the most acceptable use to area residents and businesses.



**Photomontage: Four-Story Building Viewed
from Corner of Sansome and Union Streets**

● Figure No. 20a

SOURCE: H.O.K. Associates



**Photomontage: Four-Story Building Viewed
from Corner of Sansome and Greenwich St.**

●Figure No. 20b

SOURCE: H.O.K. Associates



**Photomontage: Four-Story Building Viewed
from Levi's Plaza Near Sansome Street**

●Figure No. 20C SOURCE: H.O.K. Associates

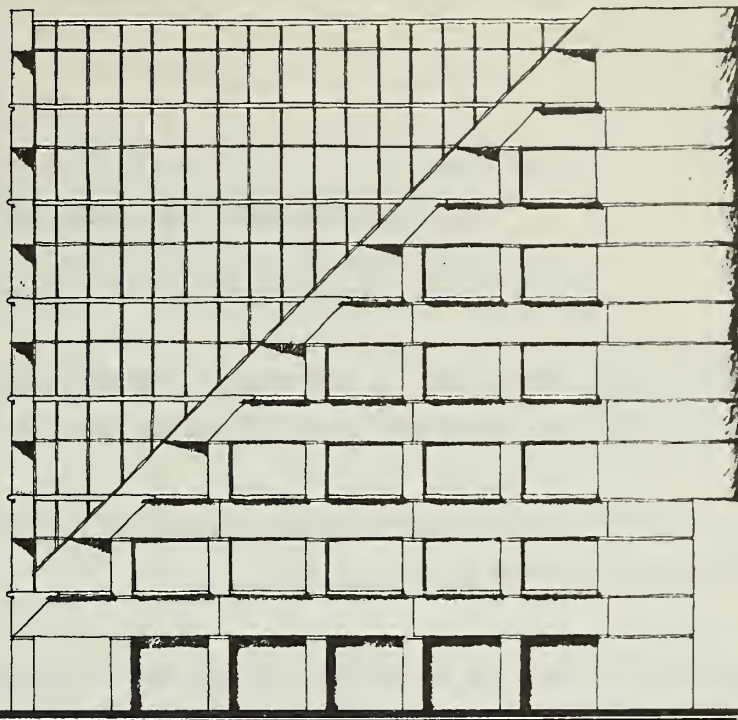
Commercial or residential use of the site would not yield project designs that would be incompatible with the setting if the building design were aesthetically pleasing and of appropriate mass and configuration in harmony with the other structures in the project area. Residential development of the site could provide about 40 to 50 dwelling units with about 40 to 50 parking spaces on the site. Present zoning amendments would allow a maximum of 56 dwelling units on the site.

E. ALTERNATIVE DESIGN

A previous building design for the project site contained a canted (sloped) building wall on the northeast building corner oriented toward the intersection of Filbert and Sansome Streets (Figure 21, page 52). The canted wall was to be uniformly surfaced with glass. However, the design of the northeast building corner was subsequently changed to the current proposal of horizontal terraces progressively set back at each upper floor. The objective was to maintain the basic shape of the structure while reducing the building's apparent mass, preserve views of the Bay from portions of Telegraph Hill, maintain an informal character in recognition of the Filbert Street steps and gardens, and avoid the potential for glare from the glass on adjacent properties.

**North
Elevation**

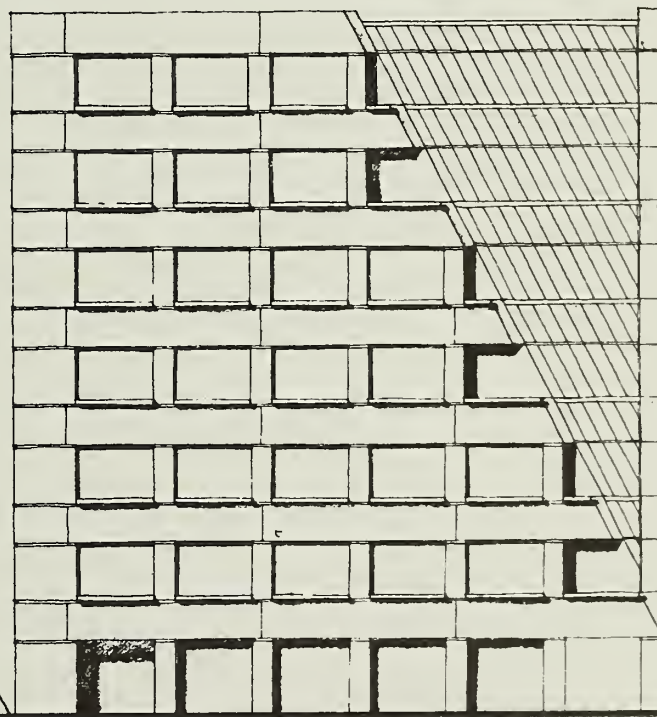
Sansome
St. ↓



Telegraph
Hill

**East
Elevation**

Telegraph
Hill



Filbert St. ↓

← Sansome St. →

Alternative Design Building Elevations

0 10 20 40
Scale Feet

Source: H.O.K. Associates

Figure No.21

VI. UNAVOIDABLE ADVERSE IMPACTS

The project would block views of the existing exposed slope of Telegraph Hill to the west of the project site as viewed from Levi's Plaza and from travelers along Sansome Street.

Project construction may generate vibration during site preparation activities which could cause loose rock and soil to fall or ravel.

The project site would be susceptible to rock and slide debris falling down Telegraph Hill in the event of a severe earthquake.

VII. SUMMARY OF COMMENTS AND RESPONSES

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I. LIST OF COMMENTORS

A. PERSONS COMMENTING AT THE PUBLIC HEARING, MAY 20, 1982

Susan Bierman, member, City Planning Commission

Jerry Petruzzelli, President, Telegraph Hill Dwellers

Nan Roth, Telegraph Hill Dwellers

Robert Ransome, Telegraph Hill Dwellers

Sue C. Hestor, San Franciscans for Reasonable Growth

B. PERSONS COMMENTING IN WRITING

Jerry Petruzzelli
President
Telegraph Hill Dwellers
Letter of 19 May 1982

Nan G. Roth
Letter of 20 May 1982

Jonathan H. Malone, Secretary
Landmarks Preservation Advisory Board
Letter of 7 April 1982

II. RESPONSES TO COMMENTS

A. URBAN DESIGN

I. Blockage of Views of Telegraph Hill Rockface

COMMENT

Mr. Jerry Petruzzelli

"The proposed location is now occupied by a one-story warehouse ("King's Antiques"), leaving the Telegraph Hill cliffs, native vegetation, gardens and Filbert Steps exposed to view from above and below. This view is a historical and natural transition between the Community Business District below and the Residential District above. It would be substantially blocked as seen from the recently completed public open space at Levi's Plaza and by travelers along Sansome Street (see: DEIR, pp. 3, 28 and 53, and particularly Illustrations No. 16/17 on pp. 35/36).

"For these reasons, we propose to change the DEIR statement that 'the building would serve as a structural mass aiding in the visual transition between larger buildings of Levi's Plaza and the smaller dwelling units and apartment buildings on the upper portions of Telegraph Hill' to read: '... would serve as a structural mass disturbing the historical and natural transition ...' etc.

"The transition from C-2 to Residential, from Waterfront to Telegraph Hill, is particularly sensitive due to the extensive development that has taken place along the entire Northern Waterfront. We recall the prophetic working paper on the Northern Waterfront by Arthur D. Little (Consultant to the Port) which stated in 1966: "The very uniqueness of this situation creates the danger that success will suffocate the area because of congestion and overconcentration of activities.

"The overall size of the office building does not provide a transition between Levi's Plaza and the Hill, as the DEIR suggests, but merely carries the bulkiness of the office structures closer to the more human scale of the Hill Dwellings.

"In addition to that, the Hill Dwellers believe that the construction of this particular building is in violation of Conservation Policy No. 7 of the City's Urban Design Plan. You are well aware that that particular policy provides, and I quote:

'That any design shall recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character.'

"It is apparent to us that this particular building, as it must be apparent to anyone who looks at the building plan -- would obstruct a unique view of San Francisco, and it would hinder the visual form and character of the area immediately next to Telegraph Hill. The entire east face of Telegraph Hill would be obstructed; and by that I mean the only naked face which remains on the Hill would be obstructed by this development.

"The final point I would like to make before you today, and I think this is the most important point, is that this particular building doesn't belong in this particular place -- at least, not in its anticipated height.

"The Draft Environmental Impact Report minimizes the impact that the building's height will have on the Hill. There is an error -- whether it is inadvertent or intentional, I do not hazard a guess -- in the report which leads people to believe that the building is only five stories high, when, indeed, it is seven stories high. And I think that that is quite deceptive. It will mislead people who do not analyze the report very carefully.

"Two fewer stories would preserve the view of Telegraph Hill from the Embarcadero. In addition to that, it would carry out the City's design policies as enunciated in the Urban Design Plan and the Northeastern Waterfront Plan.

"The Hill Dwellers believe that it would be extremely inconsistent of the City Planning Commission to authorize violations of plans which it, itself, approved, along with various other neighborhood groups."

"The model photograph on page 14 (Figure 5) shows a 5-story building instead of a 7-story building."

Commissioner Bierman

"Page 11, Figure 4, we need a drawing of the proposed building as it will look on this photo. You should have a photo on one page, and then a photo right next to it of the existing cliffside, so that it is really quite easy to see how it changes the character of the area.

"Page 34, 35 and 36 shows the building outlined, and it shows the trees and the cliff coming through that outline. And it seems to me it should fill in that building, so that you really see what the building is. It should be, in each of those, a solid building, and then show the cliff, so that we are really getting a picture of what will be disappearing."

RESPONSE

The visual and urban design impacts of the proposed project are discussed on pages 27-40 of the EIR. Visual obstruction of views is noted on pages 27 and 28 of the EIR, and illustrated on Figures 11-17, pages 30-36.

The second sentence of the third paragraph of page 3 of the EIR has been amended to state:

"The building would serve as a structural mass which could provide a visual transition between larger buildings of the Levi's Plaza project and smaller dwelling units and apartment buildings on the upper portions of Telegraph Hill."

Figure 5 on page 14 is not intended to illustrate the complete configuration of the proposed building. Figure 5 is a photograph of a study model of the northeast building corner illustrating the concept of the terraced building corner and corner wall angle. The model was prepared by the project architects to study the scale characteristics, sun and shading effects, and proposed detailing of the northeast building corner. The model does not contain the full seven floors proposed or complete north and east building walls. The full height, length and width of the building is shown on Figures 6-8, pages 15-17. Figure 5 will be amended to state "model photograph of major building form and detail concepts."

Figures 3 and 4 on pages 10 and 11 have been modified to show the project site with and without the project to illustrate how the project would affect the character of the setting. Accordingly, two figures have been added, labeled 3A and 4A.

Figures 15, 16 and 17, pages 34, 35 and 36 have been modified to show the project site without the proposed structure, and to then show the project site with the proposed structure superimposed on the figures. The building's profile has been darkened to more clearly illustrate those features of the existing setting that would be obstructed from view. To make this change, Figures 15A, 16A and 17A have been added to the EIR, pages 34A, 35A and 36A.

2. Relation of Project to Adopted Plans

COMMENT

Mr. Jerry Petruzzelli

"The DEIR quotes extensively from the Northeastern Waterfront Plan and the Urban Design Plan, with considerable emphasis on the developer's point of view that the structure would complement existing configurations rather than disturb them.

"Unfortunately, important quotes from both plans, submitted by the Telegraph Hill Dwellers and several citizens were not included in the DEIR. We therefore ask for the inclusion of the following considerations in the final EIR.

"a) Northeastern Waterfront Plan (Land Use, Base of Tel. Hill)

"Develop the area to a lesser intensity of activity than the adjacent downtown and Fisherman's Wharf area in order to provide a relief in intensity from these areas. (Objective 3, Policy 4, p. 30).

"The proposed building does not meet this criterion.

"Avoid blockage of private and public views and maintain sightlines between the waterfront and Telegraph Hill (Objective 5, Policy 2, p. 31).

"The project's main blockage consists of views from below. The Levi Strauss complex was designed to provide a major experience of open space, a major park and a meaningful transition from the waterfront to the rugged cliffs of Telegraph Hill. One of the most spectacular features is the vast public plaza linking the Bay to the Filbert Steps. This unique vista would be significantly diminished by the intrusion of a 7-story office building, hiding large portions of the cliffs and vegetation from view and leaving only a minor opening for a narrow view of the Filbert Steps.

"It is regrettable that the developer, who gave the City the beautiful open spaces within the Plaza, would now proceed to block some of the best views from here with a bulky office building. The effects can be clearly seen on Figures 16/17, pp. 35/36 of the DEIR. We also refer to the description of the effects on pp. 3, 28 and 53.

"b) Urban Design Plan: Policies for City Pattern

"New building development should respect existing landscaping and avoid displacing or obscuring it. (Policy 4, p.10).

"The Filbert Steps Gardens are justly famous beyond their own neighborhood and beyond San Francisco. They have been honored by the Mayor, the Supervisors and many citizens groups. A 7-story office building, approximately 20 feet above the bottom of the gardens, will seriously affect their enjoyment by the public. The famous bench at the bottom of the gardens, where many step climbers take a refreshing rest, is decorated with a bronze plaque, reading:

'I've a feeling we're not in Kansas any more'

"It should be replaced with the statement

'I've a feeling we're in downtown San Francisco'

"c) Urban Design Plan: Policies for Conservation

"Where areas are so outstanding, they ought to be specially recognized in urban design planning and protected, if the need rises, from inconsistent new development that might upset their unique character . . . It is the combination and eloquent interplay of buildings, landscaping, topography and other attributes that makes them outstanding. For that reason, special review of building proposals may be required to assure consistency with the basic character and scale of the area. Furthermore, the participation of neighborhood associations in those areas in a cooperative effort to maintain the established character, beyond the scope of public regulation, is essential to the long-term image of the area and the city. (Text discussion from Policy 7, p. 25).

"If this policy has any meaning, it certainly applies to the proposed site. Sansome Street has already been increasingly walled in by massive buildings, hiding more and more of the cliffs and vegetation of the Hill and reducing the prominence of historic access ways such as the Greenwich and Francisco Street steps. The proposed office building would compound this negative impact, in violation of the letter and spirit of the Urban Design Plan.

"There can be no doubt that 1299 Sansome will erase forever a naked cliff face which reveals the existence of the Hill to all who face it from the East. This plainly contradicts Conservation Policy 7 of the City's Urban Design Plan. That Policy provides that new buildings shall "Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character." We believe that the inconsistency of the building with this goal is self-evident. Indeed, the DEIR so recognizes.

"The blank west wall of the project would present an extremely bleak view for Hill residents and for pedestrians using the Filbert Steps. A modulation of the surface and/or vine cover would help, should the project be approved."

Ms. Nan G. Roth

"In reviewing the DEIR for 1299 Sansome Street Office Building, I became very concerned about the form and lack of objectivity of the section dealing with the environmental impact of the project on urban design factors.

"Although conformity with the goals and policies of general and specific plans applicable to the area is an important element in the environmental impact assessment process, it is not and must not be the only criteria used for evaluation. I am truly dismayed that the Office of Environmental Review accepted this document as complete. This singular approach is clearly biased in its content, in that it omits important issues raised by the community as well as relevant policies in the referenced plans, and in form, in that relying on this type of outline with selected policy quotes (sometimes out of context) followed by lengthy defensive statements tends to confuse the reader with detail to the point where he loses track of the issue---the classic 'can't see the woods for the trees' dilemma.

"I was not on the distribution list for this EIR when it was originally distributed, which was fine. I had not been involved in this discussion previously. But since I was later drawn into it -- in view of the fact that I was going to have to speak in place of Jerry today, had he not been able to get here in time -- I felt compelled to comment on something about this Environmental Impact Report that I found very upsetting. And that was the form on the section of Urban Design and the fact that it was solely made up of extractions from plans, some of which were quoted out of context, and all of which were constructed in such a way as to, I felt, unfairly favor the Developer's proposal.

"And I had written a letter to cover that particular issue, and I have attached to it a sample of what upset me; and that included copies of the portion of the Urban Design Plan that was quoted. And I ask the members of the Commission to compare that with what actually appeared on those particular pages which I identified of the Environmental Impact Report. And I would simply like to pass those letters around now, and you may read them at your leisure. I have one for the Office of Environmental Review, and the Director's Office, also."

Commissioner Bierman

"Page 29, the last paragraph, I don't agree that this building conforms to major New Development Policy 6. It doesn't seem to relate to the prevailing scale of development to avoid overwhelming or dominating appearance in new construction. In fact, to me it does just that. It overwhelms and dominates. And I don't think that that is a correct use of New Development Policy 6.

"Policy 4, talks about making a gradual transition. And to me, this is a pretty massive way of making a gradual transition.

"Policy objective 5, I don't think it enhances the physical form of the Hill. Now, granted there has certainly been an attempt made to step something back. But it still is going to overwhelm the site of the Hill, in my view. Certainly, the front of the building is just the front of a big building. And although the side may terrace a little, I don't think it's answered the problem enough.

"We can use words any way we want to, to suit any purpose. I think we all know that. My purpose in the way I am feeling about the Hill is that this rocky spot is very beautiful, very rugged. And if a building must go there, it shouldn't completely hide that beauty. That beauty has enhanced Levi Plaza's open space, and it doesn't seem to me that that is adequately covered in the EIR.

"I think the photograph on page 11, Figure 4 tells more than all the Urban Design verbiage that is quoted. And I want to say that I think Levi Plaza is one of the most -- and I know the people who are here who did it -- and I think it is an asset. It is a beautiful place. The Plaza is beautiful. People talk to me often about: have you been there? Have you seen it? Have you seen the fountains?

"And I think one of the things people like is that as you walk toward the west, you have that wonderful natural feeling of Telegraph Hill, and there is not much of it left. I reluctantly, and I know I was fighting about it -- about the buildings to the north that are hiding cliffsides, the parts of the residential buildings. And I went along with it because we need housing and because this was an important project. But it is inconceivable to me that this last spot needs to be lost, when it is really such an asset.

"There is office space in Levi Plaza. Maybe it is all rented. And if a building has to go here, I can understand that. But it really ought to fit in better with the Hill.

"To destroy the rock face view by building a taller, bulkier, rather than a shorter building because there isn't adequate office space, after approving Levi's Plaza, defies my belief.

"So much work and so much time and so much negotiation went into making Levi's Plaza what it is, that it seems a shame to not work harder and maybe sacrifice the rental space in this building. Do a building -- if a building has to go here -- do a building just for the two major occupants, but not the retail, and not the other rented office space.

"I personally wish there was a way that the City could buy this spot of rocky crag. Years ago we got the City to buy property up on the upper Haight-Ashbury, and it was a lot of it to look at. And I think that is what has been forgotten in this. When Telegraph Hill is gone, it's gone. I mean, the bottom part has really been the thing that sets it off from other hills in the City. The look of it and especially from Levi's Plaza. And I just think that that ought to be covered some better way than this. About how this rocky crag contributes to Levi's Plaza look, itself."

RESPONSE

Refer to the previous Response under the heading A. Urban Design, 1. Blockage of Views of Telegraph Hill Rockface (page 61).

Reference to Objective 3 and the content of Policy 4 of the Northeastern Waterfront Plan is noted on page 29 and 37 of the EIR. With respect to the wording of Objective 3 which calls for strengthening existing uses in the Base of Telegraph Hill Area at an intensity which would provide a relief from the adjacent downtown and Fisherman's Wharf areas, a principal measurement of intensity may be the amount of pedestrian traffic the project would generate in the project area. The proposed structure, because of its size and use as office space, would be expected to generate less pedestrian activity in the area than larger office buildings downtown or commercial establishments in the Fisherman's Wharf area which remain open into the evening hours. For comparison, the basic FAR of the project area and Fisherman's Wharf is 5:1 while the basic FAR in the C-3-0 (downtown office) district is 14:1.

The following material is added below the last paragraph on page 27:

"Policies from the Northeastern Waterfront Plan Base of Telegraph Hill Area, Objective 3, Policy 2: 'Avoid the blockage of private and public views and maintain sightlines between the waterfront and Telegraph Hill.'²"

The following material is added after the last paragraph on page 39:

"City Pattern Policy 4 of the Urban Design Plan: 'Protect and promote large-scale landscaping and open space that define districts and topography.'"

Discussion of the project's landscaping is presented on page 40. The phrase in the comment "New building development should respect existing landscaping and avoid displacing or obscuring it" is derived from the text under City Pattern Policy 4, page 10 of the Urban Design Plan.

Blockage of views of the existing exposed slopes of Telegraph Hill at the project site is noted on pages 3, 28, 39 and 53 of the EIR. As noted therein, the project would block views of the existing exposed rockface of Telegraph Hill to the west of the project site as viewed from Levis Plaza and from travelers along Sansome Street. As shown on Figure 15A, page 11, the project would not obstruct views of the Telegraph Hill slopes along Sansome Street from the south property line to Green Street, a distance of about two blocks.

Discussion of the project's relation to Conservation Policy 7 is presented on page 39 of the EIR.

The west facing wall of the proposed structure is shown on Figure 8, page 17 of the EIR. Design features including the use of vines for the west facing wall are discussed on page 39 of the EIR.

3. Blockage of Views of and/or From the Filbert Steps

COMMENT

Ms. Nan G. Roth

"The area adjacent to this project, the Filbert Steps, is an area of outstanding and unique aesthetic and cultural importance. This DEIR and project clearly do not acknowledge this. I hope you will carefully weight this factor as you review this document, and that you and the other members of the Commission will find it important enough to ask that the urban design portions be rewritten to more accurately reflect the environmental issue involving the sensitive Filbert Steps area."

RESPONSE

The uniqueness of the Telegraph Hill area is noted on page 27 of the EIR. View blockage is discussed on pages 27, and 28 and illustrated on Figures 11-17, pages 30-36. From the information presented, the reader may decide the relative magnitude and level of significance of view blockage that would occur due to the proposed project.

4. Building Form and Scale

COMMENT

Commissioner Bierman

"The project may be less bulky than the Levi's Plaza buildings, but is it less bulky than the buildings on west side of the street and most buildings surrounding it?

"The drawing on the photo seems to deny that. It looks as though this building will be bulkier than those that are near it on the west side of the street.

"Page 37, how can this be of similar bulk, when you look at the penthouses on the Walter building and on top floors of that building? In other words, even though it may be that the Walters building is a tall building, the height comes from a very small penthouse. I mean, at least part of the height is that penthouse. It didn't seem to me that that building is as bulky as this one; that is just the way it appeared to me."

Mr. Jonathan H. Malone

"The section here, (on p. 37 and on p.50) dealing with the visual transition which the project is to provide between Levi's Plaza and the residence on Telegraph Hill is subjective. Also, the structure would have less bulk than buildings to the east, but not to the south or west."

RESPONSE

Building bulk may be determined by the overall length, width and height of a structure. Generally, a structure that contains windows, terraced building sides, or other forms of physical wall variation that provide visual interest or change in building shape tend to break up the perceived structural mass or size of a building and reduce its apparent visual bulk. The proposed project's height above the warehouse portion of the Walter's warehouse and penthouse is noted on page 37, first paragraph. The project rooftop would

rise about 15 feet above the rooftop of the residential penthouse of the Walter's warehouse and would be about equal in height to the penthouse tower which rests above the warehouse. The building would be three stories higher than the structure under construction on the north side of the Walter's warehouse.

B. TRANSPORTATION

I. Transit

COMMENT

Sue Hestor

"I have a real question with the transit analysis, or lack thereof. Again, starting on page 3, you find out that it was decided -- they decided that you didn't have to look at it.

"So you go back to the Draft Initial Study, page 85, and you look at the transportation check list. And you find, 3, 'effects on existing parking facilities?' 'yes.' You find some 'maybe's,' and you find three 'no's' -- an increase in traffic -- 'no increase in traffic which is substantial;' 'alteration to current patterns of circulation' is a 'no;' 'construction of public roads' is a 'no.'

"And so you have a little bit more explanation on transit. But what is missing here is an explanation of the very different nature of transit services in that part of the 'downtown' which happens to be zoned C-2, from the part of the downtown in C-3-0 area.

"One of the implications of the terrible Muni service, and despite the fact that the load factors are low on those lines, one of the reasons why the load factors are low on those lines up there is that Muni service is so difficult and so hard to deal with if you are a worker in that area, because there are so few connections, and if you miss your bus you are going to have to wait for 30 minutes for a large portion of the day, and it's isolated in nature, is that everyone drives to work. And in driving to work in that part of town, you are being funneled in.

"I think the glossing over of the transit and the traffic relationship of this project by saying: all you have to deal with it is in the Initial Study, was wrong.

"One of the reasons why I have problems with that is then you don't get to any mitigation measures that make any sense.

"I know Levi's Plaza. We have got some really good things out of them. But one of the things that we haven't gotten yet from the Developers in that part of the City is

the funding to extend the transit system so that people really do have an incentive to take transit.

"It is a very long walk. If you miss your bus and you are up at Filbert and Sansome Streets and are trying to connect to a neighborhood serving line, you are going to have to walk three quarters of a mile. I used to do that. And it's difficult, and it's a real disincentive to taking Muni. That is why Muni service -- I mean, those lines don't run that often, especially if you work on something other than a normal schedule, where you are leaving in peak rush hours.

"So I would like you to put into the text section a more substantive analysis of the transit disincentives in that area. And because that is also tied with parking incentives that go against City policy, and discouraging people driving to work.

"Another thing that I think really belongs in this EIR, and any EIR for this general area, is something that explains the total amount of office development, including conversions that have occurred in the C-2 area north of the C-3 area, and east of Columbus; because there has been an explosion. And I think that you need to put the context of that area explicitly in there: in terms of workers; in terms of cars; in terms of square feet.

"Because over the past ten years the amount of office space has gone up astronomically, and the City has not yet, to this day, looked at how we are going to really deal with getting people out of their cars in that area.

"Maybe one of the mitigation measures that has to be looked at for new projects is the funding of the line that goes down the Embarcadero. The City has been kicking that one around for a couple of years.

"If there was an attractive system that was going down to the Wharf that these people who work in that area could easily feed on to during rush hours, I think there would be a lot more people taking transit. Right now those bus lines don't provide that service at all, and they are -- the fact that they have low loads is irrelevant."

RESPONSE

As outlined in the DEIR and Final Initial Study, the 32 and 42 lines are the only Muni lines serving the area. Golden Gate Transit's transbay service also serves the site.

Muni staff¹ indicate that both the 32 and 42 lines provide service to/from the downtown at five minute and eight minute frequencies, respectively. The 32 line operates at a peak hour load factor of about 0.75 (a load factor of 1.00 equates to 50% standees) and the 42 line operates at about 0.50. These load factors and service frequencies suggest that the (1299 Sansome) project's occupants could utilize these services.

Levi Strauss Co. provides a private shuttle service to/from the downtown for Levi employees only. This service is heavily used by Levi employees, indicating a strong transit demand by the area's employees.

2. Parking

COMMENT

Mr. Jerry Petruzzelli

"The proposed building will not provide any parking. The existing garage to the north would provide approximately 70 spaces. In view of the fact that the Levi Strauss complex itself provides less parking than normally required, the impact of the additional office building on the area will be severe, as the recently increased parking shortage in the area demonstrates."

Sue Hestor

"I would like to point to your attention, is that in the Levi Strauss Resolution, you reserved 150 parking spaces for the Icehouse Merchandise Mart in the Levi Plaza EIR.

"You currently have kicking around a conversion of the Icehouse from a merchandise mart, or whatever its technical designation was, to a full regular office building. And it's my understanding, from reading the Levi Square EIR, that even though you didn't -- you were looking at parking for the Icehouse, because the Icehouse had a specific kind of use that would have cars coming in all day. We have different standards for merchandise marts and cars, than we do for office workers and cars.

¹Angelo Figone, Muni Scheduling Department, telephone conversation, May 27, 1982.

"And I think your staff should look at that condition and find out if you want to reserve 150 spaces for an office building in that garage, and how you are really going to look at parking requirements in that area."

Commissioner Bierman

"Page 5, the project sponsor is asking for enforcement of parking regulations. And I didn't remember that being in any EIR before. And with all the furor over parking problems, I wondered if that was an appropriate comment."

RESPONSE

The proposed project's floor area has been refined since the publication of the Draft EIR and would now provide about 34,900 square feet of occupied floor area rather than the 38,700 square feet described in the Draft EIR. As such, the parking requirement would be reduced from 77 spaces to 70 spaces. The project proposed to provide 70 parking spaces off-site within an 800-foot walking distance for the life of the proposed project, an estimated 90 years.

The project sponsor proposed to provide this requirement by converting unused storage space to parking within the Block F parking garage located at the southwest corner of Sansome and Lombard Streets. Further and more recent refinement of the conversion plans identified that the conversion would provide tandem parking rather than the independently accessible spaces required by the City Planning Code. The project sponsor, therefore, would have to seek and justify a variance to allow tandem parking of the 70 new spaces within the Block F garage.

A parking analysis conducted as part of the variance application found that the weekday utilization of parking spaces within the Block F garage is about 30% despite the fact that the Levi's Plaza development has reached about 75% to 80% of its full build-out and occupancy. This is believed to be a result of the high use of transit, the present Levi's Plaza shuttle service, lack of short-term parking generators such as major shopping facilities and other factors. The parking study found that the weekday utilization of major public parking facilities within an 800-foot radius of the proposed project site is currently at 40% occupancy, (PRC Vorhees, Parking Analysis for 1299 Sansome Street Office Building, May 14, 1982, on file, 81.415E, in the Office of Environmental Review, 450 McAllister Street, 5th Floor).

The 30% occupancy rate of the Block F garage indicates that the proposed project's parking requirement could be accommodated by existing available parking resources within the area and no new parking spaces would be required to serve the proposed project. Therefore the project sponsor proposed to request a variance from the City Planning Code to allow an exemption from the off-street parking requirement and would include a provision such as the following:

The project sponsor would contribute up to \$5,000 to the DCP to cover the cost of the design, administration and analysis of a parking survey of Block F garage users and other parking resources within the area, as appropriate.

The survey would take place within one year of full build-out and occupancy of both the proposed project and the Levi's Plaza development. If the survey indentified a 90% or higher occupancy rate of Block F garage parking spaces and a high utilization (80% or greater) of other parking resources in the area, the project sponsor would convert unused storage space within the Block F garage to parking, would work with the DCP to design acceptable operational management system for tandem parking, or would provide valet parking for the life of the project and would seek all appropriate permits to fulfill this requirement.

Page 13 of the EIR, would be amended to add in the first paragraph:

"The project sponsor would seek a variance from Article 1.5, Section 151 of the City Planning Code to allow an exemption from the off-street parking requirement and would include a provision such as the following:

The project sponsor would contribute up to \$5,000 to the DCP to cover the cost of the design, administration and analysis of a parking survey of Block F garage users and other parking resources within the area, as appropriate. The survey would take place within one year of full build-out and occupancy of both the proposed project and the Levi's Plaza development. If the survey identified a 90% or higher occupancy rate of Block F garage parking spaces and a high utilization (80% or greater) of other parking resources in the area, the project sponsor would convert unused storage space within the Block F garage to parking, would work with the DCP to design an acceptable operational

management system for tandem parking, or would provide valet parking for the life of the project and would seek all appropriate permits to fulfill this requirement."

The City has approved the Icehouse conversion (81.258V) and did not require further parking beyond the 120 spaces currently reserved for Icehouse use. To reduce the need for additional parking. The following conditions were imposed on the Icehouse conversion:

- contribution to an equitable funding mechanism for augmenting transportation services
- retention of a transportation broker to implement side sharing and promote increased transit usage
- provision of on-site bicycle parking
- equitable contribution to costs of new intercept parking and Muni shuttle service
- conduct a post-occupancy trip generation survey

On page 89 of the EIR, the Final EIR Study indicates that short-term curb parking is being used by area employees because the parking limits are probably not being aggressively enforced. The EIR suggests that increased enforcement would shift employee parking to lots/garages, freeing the curb spaces for visitors and/or area residents.

3. Traffic

COMMENT

Sue Hestor

"There are only a couple ways to get into that site. And it seems like the Bay/North Point/Beach Street area is always being torn up for something or other, and there are always traffic problems in that northern part of the transportation corridor. I mean, there has always been an obstruction in the 13 years that I have lived in San Francisco, I can't remember a six month stretch when one of the major arterials to the north of the Hill wasn't being torn up. They were torn up with a sewer project; they were torn up with the cable car repairs.

"That funnel is ridiculously congested, yet people can get to that site from the north; they can get to that site from the south on Embarcadero, which is another arterial that has real problems because it is torn up all the time; or Sansome and Battery -- one pair of streets.

"You can't go east/west real easy to get to that site, because Telegraph Hill is there. So you can use Broadway, or if you are sneaky and know how to use the Union Street pair, the Union and Vallejo -- that kind of dogleg over Telegraph Hill - you can drive that way.

"So here you have a situation where we have intentionally and unintentionally poured a lot of offices into an area that has terrible transit, and the people are going to drive to. And by driving to that area, they are not only causing the parking problems that you have listed in here, but they are causing traffic congestion problems because the traffic is slowing down and maneuvering around that area, and other people are trying to go through it to get to the Golden Gate Bridge."

RESPONSE

The transportation section of the Final Initial Study outlined existing traffic conditions for the existing street network and projected future conditions with the project. Page A-28 of the EIR, the Final Initial Study, discusses the effect of the proposed project as well as cumulative developments within the area on traffic conditions. The sponsor has included in the project mitigation measures (outlined on page 4 of the EIR and on pages A-50 - A-51 in the Initial Study) to encourage transit usage and flexible working hours. These measures would help reduce traffic congestion in the project area. Based on the analysis in the Initial Study and on measures included in the project to reduce traffic congestion, the project would not result in significant traffic impacts.

Within the project area, sewer construction is complete and the construction of Levi's Plaza will be complete prior to the proposed project's occupancy; therefore traffic problems that may have resulted from these construction activities would not affect project-related traffic flows.

C. LIGHT AND GLARE

COMMENT

Mr. Jerry Petruzzelli

"There is a glaring omission respecting light reflection from the project. As you know, there was a lengthy battle between East Telegraph Hill residents and Levi's Plaza over lights reflecting through windows at night, harming views and upsetting residents. Finally, provision was made to ensure that Levi's offices would have (a) special blinds and (b) would be required to have those blinds drawn at night. This solved the lighting problem. The same problem exists as to 1299 Sansome. However, the issue is overlooked by the DEIR and no solution is therefore proposed as a mitigation measure. The Hill Dwellers requests that such a measure requiring special blinds, and their use, be placed as a condition on the project. We ask that if the project goes forward the developer be made to abide by the terms of Exhibit C to City Planning Commission Resolution 8142 passed on January 4, 1979 concerning Levi's Plaza."

Mr. Robert Ransom

"As to lights, I think every possible measure should be taken to reduce the emission of light. One factor which has already been mentioned by the Telegraph Hill Dwellers, has not been taken into account on page 39 of the EIR, is the effect on those living on Telegraph Hill from the reflection of light in windows across from the project.

"On page 77 of the EIR is a photographic view of a residence -- from a residence below the intersection of the Filbert Street steps and Napier Lane. That photograph shows a billboard on Sansome Street. At night the billboard is lit and the lights are reflected in the windows of the Levi's Plaza Building across the street. And that is a perfect example of what happens when, even though the light is facing in the opposite direction, it comes back on the hill.

"I think one condition of approval should be that all windows be equipped -- all windows, not just some -- with Venetian Blinds mentioned on page 39 of the EIR, and that the janitors be required to close blinds while performing their services.

"Since all the lighting problems cannot be anticipated, I think a provision similar to the last paragraph of Exhibit C of the Levi's Plaza Resolution 8142 should be included; and such a paragraph might read:

'The Developer recognizes the expressed concerns of Telegraph Hill residents regarding problems of nighttime lighting emission from the project. The Developer agrees to cooperate with the Telegraph Hill representative to take mitigating steps to develop appropriate restrictions and physical solutions subject to review and approval of the San Francisco Department of City Planning.' "

RESPONSE

The west facing wall of the structure, which would orient toward Telegraph Hill, would contain no windows as noted on page 39 of the EIR. It is noted on page 39 that lights in interior spaces would automatically be turned off at night when office spaces would not be in use. The following sentence is added to the second paragraph on page 39:

"It is not anticipated that nighttime light reflections from nearby light sources would significantly affect nearby residences."

The City Planning Commission has received a request for their review of the project's site permit application under their Discretionary Review powers. Should the Commission grant the request, the Commission could approve the project, approve the project with conditions or disapprove the project and deny the permit. As indicated on page 13 of the EIR, the Commission may take into consideration various planning as well as physical environmental issues in granting or denying the permit.

The project sponsor has indicated a willingness to abide by the applicable provisions of Exhibit C to City Planning Commission Resolution 8142, as relates to the proposed project as a condition for approval during the Discretionary Review process. The provisions of Exhibit C would mitigate any potential for light reflecting from buildings opposite the project site.

D. HOUSING

COMMENT

Sue Hestor

"When you start looking for housing and population analysis, you find out on page 3 that they decided, as part of the Initial Study, that they didn't have to go into that. And then when you turn to page A-21, which is the Initial Study that deals with housing and population, then you have the environmental evaluation check list, number five: "create an additional demand for housing, will the project do that?" "Yes" is checked off.

"And then you try and find a description in there, and you find out that the Initial Study really doesn't have anything on housing there.

"So you go to page A-4 and you find out why. And that is in the summary. It's not in the textual material on the Initial Study, it's in the summary:

'Housing impacts, the proposed project would be expected to generate a demand for 37 housing units. To date, new office development projects have less than 50,000 gross square feet have not been considered as having a significant impact upon the City's housing supply.'

"Is that the City policy? Is that the Planning Department's policy? When was a hearing held on that? What public input was there on that? Who has the right to make that decision?

"37 housing units may not be very much to this sponsor of this project. But if there is a need for 37 housing units that is unmet, and 37 existing San Francisco households are displaced because there is not sufficient housing available, that has a very big effect on those 37 people.

"What right do the EIR authors, which is the Department of City Planning, not the project sponsor, have to just say: "poof," not an issue?

"I would submit that each project of 45,000 square feet that puts a demand for housing, has the obligation to look at the housing supply of the City.

"These are not some poor little Developers. The owners of this property are some of the largest real estate movers and shakers in San Francisco. This isn't picking on MBT Associates. I have absolutely no compunction about asking Gerson Bakar and Wilson Bennett to take some of the responsibility for low or moderate income housing tied to this project -- none at all. Because they have been active in this City, and there is going to be an impact. And I think it belongs in the text, and not in a little three line rejection in the summary of the Draft Initial Study, which really doesn't have anything in it, it just says: well, they don't have to deal with it, even though you check off "yes" in your check list."

RESPONSE

In a July 20, 1981 memorandum by the Director of Planning, the Department of City Planning announced its policy that the housing production requirement applies to all new office buildings and all office conversions, citywide, that involve 50,000 or more gross square feet of office space. Projects of less than 50,000 gross square feet are exempt from the housing production requirement (DCP, Housing Requirement for Office Development in San Francisco, July 20, 1981 memorandum from Dean L. Macris, Director of Planning).

The purpose of limiting application of the housing production requirement policy was two-fold: 1) to set a limit or threshold level whereupon projects below that level would not have to be assigned limited and already over-burdened administrative and project review staff time; and 2) to avoid imposing the requirement on developers of small office projects where the return on investment would not justify provision of housing in addition to constructing the office space. It would not be appropriate to apply the policy to some developers of small office buildings and not to others merely because some developers have more financial resources than others.

In addition, the range of dwelling units that may be needed as a result of the proposed project according to the Department formula and the formula found in the 101 Montgomery Street EIR (EE80.26, certified May 7, 1981, Appendix C, pages 289-309) is 19 - 39 units. At this low a number, accuracy of estimates is limited and does not provide a sound basis for determining a significant impact.

E. RELOCATION OF KING'S ANTIQUES

COMMENT

Commissioner Bierman

"Page 7 also talks about King's Antiques. No one knows where they have gone. And it's hard to believe that no one can know where they have gone or where they have relocated. The post office has had forwarding addresses, usually. I don't understand how somebody could disappear, if you try to find the answer."

RESPONSE

King's Antiques, a retail store dealing in souvenirs and antiques, vacated the building on the project site at the end of the lease term on January 15, 1982. No forwarding address was provided by the post office, no new number is listed by the phone company, and a property record search in the leasing files revealed no information on the relocation of King's Antiques. It is therefore assumed that King's Antiques is no longer in business.

F. ALTERNATIVES

COMMENT

Mr. Jerry Petruzzelli

"ALTERNATIVES: NO PROJECT OR REDUCED PROJECT

"Our organization cooperated with the developer and his clients in the process of approving Levi's Plaza. Had we known that the present project would be added, however, we would have objected to this addition.

"We appreciate that the developer and his architects have attempted to anticipate and meet objections from Telegraph Hill property owners and residents by volunteering to reduce the allowable building envelope somewhat, and by adapting a stepped-back design and by foregoing the offensive mechanical penthouses that have marred the Levi Strauss buildings.

"However, based on the considerations listed above, we feel that the no project alternative is most consistent with the City's Waterfront and Urban Design Plans, and we urge disapproval of the project in its present form.

"As our second choice alternative, we would recommend that the building be reduced by two stories (the model photograph, Figure 5, p. 14 of the DEIR would represent such a reduction).

"While we can't agree with the DEIR that a lower building would weaken the visual transition to Telegraph Hill, we do fully agree that "a lower structure would . . . permit more view area of the quarried rock face of Telegraph Hill adjacent to the project site and would cast less shadow area north of the site. Preservation of the view of the Telegraph Hill rock face and out-croppings would better address Conservation Policy 7 of the Urban Design Plan than would the project as proposed (DEIR p. 50).

"This building in this particular place does not belong, at least not on its envisioned scale. We do not propose seriously that the project be abandoned (although such a prospect has considerable merit). However, two fewer stories would render the

building far more compatible with the environment than the envisioned height. In point of fact, only such a lower height can carry out the City's design policies as enunciated in the Urban Design Plan and the Northeast Waterfront Plan. It makes a mockery of those Plans to abandon the criteria which so many worked so long to reach in a spirit of civic compromise. That abandonment would be the logical, and inevitable; outcome of your approval of the building in its present form. The City Planning Commission has a charter to carry out those policies. We cordially petition you to do so by reducing this building's height, if the building is approved."

Mr. Robert Ransom

"I first moved to the Hill in 1938, to a house on the Filbert Street steps. Those were the Bohemian days in which we paid \$23.00 a month rent for a whole house; and I now live directly above the project.

"I wish to support the contention of the Telegraph Hill Dwellers that a five, rather than a seven story building, is more appropriate to the environment. In fact, as has been pointed out, and as the Developers themselves agree, they show a building of five stories, not seven, in their model photograph on page 14 of the EIR."

Commissioner Bierman

"I would like to see a drawing with a building at a three to one FAR. Nowhere in here did it seem to me that you could get an answer to the question: what building would not really destroy that cliffside? What building could be done that would still show the quality of a hillside?

"The FAR five to one comes because it's a special use district. It is a special use district designed to recognize the special quality of the area. I am just wondering whether the special use district was to answer some other problem, but not deal with the specialness of this particular spot."

RESPONSE

The no-project alternative is discussed on page 49 of the EIR.

Figures 15, 16 and 17 have been modified to show a building containing a 3:1 FAR, which would be a 4-story structure containing about 26,500 square feet utilizing the design of the first four floors as proposed and omitting the top three floors. The 3:1 FAR as calculated includes a bonus of 25%, which may be obtained for a property which qualifies under the code as a corner lot (area within 125 feet of a corner). The 3:1 FAR Figures are included in Section V of the EIR, Alternatives, Item C, Shorter Building Alternative, Figures 20A, 20B and 20C, pages 50A, 50B, 50C. The first line of the second paragraph, page 50, is changed to read:

"A lower structure, such as a 4-story building containing a 3:1 FAR, would create a building of less bulk than the building as proposed."

Section 240 of the San Francisco Planning Code, Northern Waterfront Special Use Districts, indicates that the Special Use Districts along the waterfront, of which there are three, are established to guide development in harmony with the physical characteristics, maritime character, land use conditions and development potential of the waterfront area.

G. PROJECT OBJECTIVE

COMMENT

Mr. Jerry Petruzzelli

"The DEIR states on page 7 that "the project sponsor has investigated leasing office space on various locations in San Francisco, but no space suitable for the operation of either firm was located.

"With over 3,000,000 square feet of office space scheduled for completion in 1982, we find this unsubstantiated allegation that no other location is available hard to believe. Specific reasons why only this particular location could serve the needs of these firms should be included in the EIR, or the allegation should be dropped."

Commissioner Bierman

"Page 7, the Developer talks about not being able to find office space suitable; so the need for this building. And it's hard for me to believe, with all that has been approved by this Commission in the past few years, that there isn't going to be any office space.

"Now, I know the office space may not be right there. But I found that comment not a realistic comment."

RESPONSE

The project sponsor wishes to remain in the north waterfront area, which is the area in which the project sponsor is and has been conducting its operations. Therefore, the project sponsor has restricted the geographic area of search for office space, largely to properties which are either owned by the project sponsor or to properties in which the project sponsor is a partner, including 900 Front Street, Levi's Plaza, Two Northpoint Street, One-Hundred Northpoint Street, One Beach Street and the Northpoint Apartment/Commercial development at Bay Street. The project sponsor believes that the proposed project would prove to be the best solution for the sponsor's needs.

H. GEOLOGY

COMMENT

Mr. Jerry Petruzzelli

"Located adjacent to one of the most severe slide areas of the City, the construction activities raise serious misgivings among adjacent property owners and tenants. The data submitted in the DEIR are not likely to diminish those concerns."

Mr. Jonathan Malone

"p. 44. The discussion on geology should address the possible effects of excavation and construction on the older houses along Filbert Street, Napier Lane, and Darrell Place."

RESPONSE

The geologic effects of project construction and operation on the residences along Filbert Street, Alta Street, Sansome Street, Napier Lane and Darrell Place were evaluated as part of this environmental evaluation. The soils and geologic analysis of the site and area determined that there would be no predictable effect to these residences. To ensure against potential effects associated with project construction and operation which could not be scientifically predicted, the project sponsor has agreed to comply with several measures which would mitigate any potential geology and soils impacts discussed on pages 44 and 45 of the EIR. The geology and soils mitigation measures are presented on pages 46-48 of the EIR.

I. HISTORICAL

COMMENT

Mr. Jonathan Malone

"p. 20, 1st para.: Remove '... during development of the San Francisco waterfront to accommodate waterborne commerce.'

"There were additional reasons for landfill patterns not easily condensed for the purposes of this report.

"p. 21, 3rd para.: Remove '... the Gold Rush warehouses preserved from the 1906 fire.' and substitute '... the warehouse character of the area marked by structures dating in age from the Gold Rush to mid 20th century.

"p. 21, 3rd para.: The proper name would be 'North Point Warehouse', not 'Building'.

"p. 38, 2nd para.: The statement on use of brick in the district should be attributed to one Board member."

RESPONSE

The second sentence of the first paragraph on page 20 is changed to read:

"The site is within an area of the hill that was quarried during the late 1800s for sea wall construction and Bay fill."

The first sentence of the third paragraph on page 21 is changed to read:

"The area of the northern waterfront containing the project site is a candidate for designation as a historic district because of the warehouse character of the area marked by structures dating in age from the Gold Rush to mid 20th Century."

Reference to the words "North Point building (Seawall Warehouse)" is changed to "North Point Warehouse" in the third paragraph on page 21.

The second paragraph, page 38 is changed to read:

"At the regular meeting of the Landmarks Preservation Advisory Board on July 1, 1981, during a presentation of the project by representatives of the project sponsor, it was noted by a Board member that 'the area is being built up with a great deal of brick, and that another material would be refreshing.'⁵"

J. OTHER ISSUES

1. Construction Noise

COMMENT

Mr. Jerry Petruzzelli

"Residents of the Hill have suffered throughout the construction of Levi's Plaza. Should the project be approved, a binding commitment should be made by the developer that no work will be performed on Saturdays, Sundays or Holidays."

RESPONSE

The project sponsor has included as part of the project the following measure which would be included as a condition for approval of the project's site permit if the City Planning Commission grants the request for Discretionary Review and subsequently approves the project permit with conditions:

"No heavy construction work, such as building fabrication and erection that would generate noise, would be conducted on Saturdays, Sundays or holidays. Once the building frame and shell would be in place, no noise generating construction work external to the building would be conducted on Saturdays, Sundays or holidays."

2. Discretionary Review Process

COMMENT

Mr. Jerry Petruzzelli

"In case of Discretionary Review, the Planning Commission would consider "the effect of the proposed project on such . . . issues as enhancement of pedestrian environment . . . physical relationship of the proposed building to its environs; and effects on views from public areas and on the City skyline (DEIR p. 13).

"Based on the considerations listed above, we feel very strongly that many crucial criteria have not been met."

RESPONSE

The City Planning Commission has received a request for Discretionary Review of the proposed project's site permit application by a neighborhood group. Should the Commis-

sion grant the request, the Commission could address broader planning issues as well as specific environmental issues. Some of these issues are presented on page 13 of the EIR. The Commission would determine for themselves based on information presented in the EIR, other Department documents and public testimony, whether or not they thought the criteria were met.

3. Downtown EIR Analysis

COMMENT

Ms. Sue Hester

"Finally, I would like you to not disregard the downtown EIR in this EIR. Because as I understand the downtown EIR, you are looking at how activity in the central business district pushes out. And I think we need to talk about this project, in light of the downtown EIR, how does it fit into the analysis that you are looking at? How does it fit into the alternatives? How does it fit into the mitigation measures? And not exclude it just because it's not in the C-3 district."

RESPONSE

The EIR on this specific project does not, and need not, evaluate the overall downtown planning possibilities. The Downtown EIR will assess a series of alternative planning possibilities for the Downtown area and is currently in preparation. The EIR, when completed, is expected to present environmental analysis of a series of future policy options for the overall development of the Downtown; specific policy changes, therefore, cannot be reviewed or adopted until after the EIR is certified.

The on-going alternative scenario analysis in the Downtown EIR covers several possible futures and encompasses numerous policies which have not yet been approved by the City. It is inappropriate to draw comparisons between existing policies and speculative future policies which may be altered or amended several times before they are proposed for approval. At this time no City policies regarding mitigation measures related to downtown development have been or could be formulated or approved as a result of the Downtown EIR process.

VIII. EIR AUTHORS AND PERSONS CONSULTED

A. PROPOSED PROJECT AND EIR

Author of Environmental Impact Report

San Francisco Department of City Planning
45 Hyde Street
San Francisco, California 94102
(415) 552-1134

Environmental Review Officer: Alec S. Bash
Assistant Environmental Review Officer: Barbara W. Sahm
Environmental Review Coordinator: Susana Montana

Author of Preliminary Draft Environmental Impact Report

Environmental Impact Planning Corporation
319 Eleventh Street
San Francisco, California 9403
(415) 864-2311
Project Manager: Ted Adams

Project Sponsor

Trust of Three
2280 Powell Street
San Francisco, California 94133
Don Wyler, Project Director

Project Architects

Hellmuth, Obata and Kassabaum, Inc.
One Lombard Street
San Francisco, California 94111
Bob Canfield, Project Architect

Project Consulting Engineers

Dames and Moore
500 Sansome Street
San Francisco, California 94111
Bill Wood, Project Manager

B. PERSONS CONSULTED

Jonathan Malone, Secretary to the Landmarks Preservation Advisory Board

IX. DISTRIBUTION LIST

FEDERAL AND STATE AGENCIES

State Office of Intergovernmental
Management (10)
State Clearinghouse
1400 - 10th Street
Sacramento, CA 95814

REGIONAL AGENCIES

Alameda-Contra Costa County
Transit District
508 - 16th Street
Oakland, CA 94612
Attn: Don Larson

Association of Bay Area
Governments
Hotel Claremont
Berkeley, CA 94705
Attn: Charles Q. Forrester

Bay Area Air Quality
Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Irwin Mussen

Caltrans
130 Oak Street
San Francisco, CA 94102
Attn: Leonard Newman

Bay Area Rapid Transit
District
800 Madison Street
Oakland, CA 94607

Golden Gate Bridge Highway &
Transportation District
P.O. Box 9000, Presidio Sta.
San Francisco, CA 94129

Metropolitan Transportation
Commission
Hotel Claremont
Berkeley, CA 94705

San Mateo County Transit
District
400 South El Camino Real
San Mateo, CA 94402

CITY AND COUNTY OF SAN FRANCISCO

San Francisco Planning Commission
Department of City Planning
100 Larkin Street
San Francisco, CA 94102
Lee Woods, Commission Secretary

Commissioners
Toby Rosenblatt, President
Susan Bierman
Roger Boas
Norman Karasick, Alternate
Richard Sklar
Eugene Kelleher, Alternate
Jerome Klein
Yoshio Nakashima
C. Mackey Salazar

Landmarks Preservation Board
100 Larkin Street
San Francisco, CA 94102
Attn: Jonathan Malone, Secretary
Philip Choy
Elizabeth de Losada
David M. Harley
Carolyn Klemeyer
Jean E. Kortum
Patrick McGrew
Ann Sabiniano
Walter Sontheimer
John Ritchie

San Francisco Fire Department
260 Golden Gate Avenue
San Francisco, CA 94102
Attn: Joseph Sullivan, Chief Division
of Planning and Research

San Francisco Muni Planning Division
949 Presidio Avenue, #204
San Francisco, CA 94115
Attn: Peter Straus

CITY AND COUNTY OF SAN FRANCISCO (cont.)

San Francisco Department of
Public Works
Traffic Engineering Division
460 McAllister Street
San Francisco, CA 94102
Attn: Scott Shoaf

Water Department
Distribution Division
425 Mason Street
San Francisco, CA 94102
Attn: George Nakagaki

Bureau of Engineering
Mechanical Section
45 Hyde Street, #222
San Francisco, CA 94102
Attn: Ray Danehy

San Francisco Department of
Public Works
City Hall, Room 260
San Francisco, CA 94102
Attn: Jeffrey Lee

Bureau of Building Inspection
450 McAllister Street
San Francisco, CA 94102
Attn: Robert Levy, Superintendent

San Francisco Public Utilities
Commission
Bureau of Energy Conservation
949 Presidio Avenue, Room 111
San Francisco, CA 94115
Attn: Flint Nelson, Director

San Francisco Committee for Utility
Liaison on Construction and Other
Projects (CULCOP)
c/o GES - Utility Liaison
City Hall, Room 363
San Francisco, CA 94102

San Francisco Public Utilities
Commission
City Hall, Room 287
San Francisco, CA 94102
Attn: Richard Sklar

San Francisco Department of
Real Estate
450 McAllister Street
San Francisco, CA 94102
Attn: Wallace Wortman

Economic Development Council
552 McAllister Street
San Francisco, CA 94102
Attn: Richard Goblirsch

LIBRARIES

Documents Department
City Library - Civic Center
San Francisco, CA 94102
Attn: Faith Van Liere

Environmental Protection Agency
Library
215 Fremont Street
San Francisco, CA 94105
Attn: Jean Circiello

Hastings College of the Law
Library
198 McAllister Street
San Francisco, CA 94102

Golden Gate University Library
536 Mission Street
San Francisco, CA 94105

Government Documents Section
Stanford University
Stanford, CA 94305

Institute of Governmental Studies
1209 Moses Hall
University of California
Berkeley, CA 94720

MEDIA

San Francisco Bay Guardian
27000 - 19th Street
San Francisco, CA 94110
Attn: Patrick Douglas, City Editor

San Francisco Chronicle
925 Mission Street
San Francisco, CA 94103
Attn: Marshall Kilduff

San Francisco Examiner
110 - 5th Street
San Francisco, CA 94103
Attn: Gerald Adams

San Francisco Progress
851 Howard Street
San Francisco, CA 94103
Attn: Mike Mewhinney

The Sun Reporter
1366 Turk Street
San Francisco, CA 94115

GROUPS AND INDIVIDUALS

AIA
San Francisco Chapter
790 Market Street
San Francisco, CA 94102

Bay Area Council
348 World Trade Center
San Francisco, CA 94111

David Caprone
Lincoln Property Company
220 Sansome Street
San Francisco, CA 94104

Building Owners & Managers Assoc.
690 Market Street
San Francisco, CA 94104
Attn: Elmer Johnson

Building Service Employees
Union Local 87
240 Golden Gate Ave.
San Francisco, CA 94102

GROUPS AND INDIVIDUALS (cont.)

Joseph Coriz
2853 - 22nd Street
San Francisco, CA 94110

Downtown Association
582 Market Street
San Francisco, CA 94102
Attn: Lloyd Pflueger

Downtown Senior Social Services
295 Eddy Street
San Francisco, CA 94102

Environmental Science Associates
1291 E. Hillside Blvd.
Foster City, CA 94404

The Foundation for San Francisco's
Architectural Heritage
2007 Franklin Street
San Francisco, CA 94109

Friends of the Earth
124 Spear Street
San Francisco, CA 94105
Attn: Connie Parrish

Charles Gill
315 Ivy Street
San Francisco, CA 94102

Gray Panthers
944 Market Street
San Francisco, CA 94102
Attn: W. Nunnally

Gruen Gruen + Associates
564 Howard Street
San Francisco, CA 94105

Heller, Ehrman, White & McAuliffe
44 Montgomery Street, 32nd Floor
San Francisco, CA 94104
Attn: Richard Millard

Sue Hestor
4536 - 20th Street
San Francisco, CA 94114

GROUPS AND INDIVIDUALS (cont.)

Chris Lavdiotis
1919 - 28th Avenue
San Francisco, CA 94116

League of Women Voters
12 Geary Street, Room 605
San Francisco, CA 94108

Legal Assistance to the Elderly
944 Market Street, #803
San Francisco, CA 94102

Gerald Owyang
1517 Reed Avenue, #12
San Diego, CA 92109

Mrs. G. Bland Platt
339 Walnut Street
San Francisco, CA 94118

Charles Hall Page and Assoc.
364 Bush Street
San Francisco, CA 94104

San Francisco Beautiful
41 Sutter Street
San Francisco, CA 94104
Attn: H. Klussman

San Francisco Building and
Construction Trades Council
400 Alabama Street, Room 100
San Francisco, CA 94110
Attn: Stanley Smith

San Francisco Chamber of Commerce
465 California Street
San Francisco, CA 94105
Attn: Richard Morten

San Francisco Ecology Center
13 Columbus Avenue
San Francisco, CA 94111

San Francisco Junior Chamber of
Commerce
251 Kearny Street
San Francisco, CA 94104

San Francisco Labor Council
3068 - 16th Street
San Francisco, CA 94103
Attn: Bernard Speckman

San Francisco Planning & Urban
Research Association
312 Sutter
San Francisco, CA 94108

San Francisco Convention &
Visitors Bureau
1390 Market Street, Suite 260
San Francisco, CA 94102
Attn: R. Sullivan, Manager

San Francisco Forward
690 Market Street
San Francisco, CA 94104
Attn: Frank Noto

San Francisco Tomorrow
728 Montgomery Street, Room 34
San Francisco, CA 94111
Attn: Tony Kilroy

San Franciscans for Reasonable Growth
88 First Street
San Francisco, CA 94105
Attn: Carl Imperato

John Sanger & Associates
2340 Market Street
San Francisco, CA 94114

Senior Escort Program
South of Market Branch
814 Mission Street
San Francisco, CA 94103
Attn: Leslie Halford

Sierra Club
530 Bush Street
San Francisco, CA 94108
Attn: Becky Evans

Kent E. Soule
1180 Filbert Street, #204
San Francisco, CA 94109

Tenants & Owners Development Corp.
177 Jessie Street
San Francisco, CA 94105
Attn: John Elberling

Paul Thayer
1033 Stanyan
San Francisco, CA 94105

GROUPS AND INDIVIDUALS (cont.)

Timothy Tosta
333 Market Street, Suite 2230
San Francisco, CA 94105

Steven Weicker
899 Pine Street, #1610
San Francisco, CA 94108

Women's Chamber of Commerce
681 Market Street, Room 992
San Francisco, CA 94105

Jeff Vance
Campeau Corp. of Calif.
681 Market Street
San Francisco, CA 94105

RIDES, Inc.
100 Van Ness Ave., 19th Floor
San Francisco, CA 94102
Attn: Charna Staten

Telegraph Hill Dwellers Assn.
Mr. Jim Augustino
426 Vallejo Street
San Francisco, CA 94133

Telegraph Hill Neighborhood Assn.
Mr. Peter Gibb
660 Lombard Street
San Francisco, CA 94133

Michael Marsh
28 Napier Lane
San Francisco, CA 94133

Linda Lowrey
30 Napier Lane
San Francisco, CA 94133

Telegraph Landing Homeowner's Assoc.
Ms. Susan Selman
150 Lombard Street
San Francisco, CA 94111

Chinatown Coalition for Better Housing
Ms. Jennie Lew
615 Grant Avenue
San Francisco, CA 94108

Chinatown Neighborhood Improvement
Resource Center
Ms. Marilyn Chu
615 Grant Avenue, 2nd Floor
San Francisco, CA 94108

Housing Development and Neighborhood
Preservation Corporation
Mr. Celso Ortiz
2588 Mission Street, Suite 200
San Francisco, CA 94110

Telegraph Landing
Mr. Kevin Wiley, Manager
150 Lombard Street
San Francisco, CA 94111

Citizens for Responsible Government
Mr. Calvin Welch
409 Clayton Street
San Francisco, CA 94117

Fisherman's Wharf Merchants Assoc.
Mr. Peter Brown
2800 Leavenworth Street
San Francisco, CA 94133

Herbert Zelinsky
152 Lombard Street, #603
San Francisco, CA 94111

J.B. Falk
25 Napier Lane
San Francisco CA 94133

J.F. Petruzzelli
29 Prescott, #5
San Francisco, CA 94133

Helen E. Rogers
21 Napier Lane
San Francisco, CA 94133

Robert J. Fogel
224 Filbert Street
San Francisco, CA 94111

Rod Freebaim-Smith
460 Vallejo Street
San Francisco, CA 94133

Jane Winslow
396 Lombard Street, #4
San Francisco, CA 94133

Rhoda Parks
25 Napier Lane
San Francisco, CA 94133

Isabelle P. Sheldon
8 Napier Lane
San Francisco, CA 94133

Charles B. Shearer
34 Darrell Place
San Francisco, CA 94133

Robert Ransome
24 Alta Street
San Francisco, CA 94133

Mrs. M. Rader
17 Alta Street
San Francisco, CA 94133

Lloyd Bray
10 Napier Lane
San Francisco, CA 94133

Jim Passage
2266 Bay Street
San Francisco, CA 94123

Milt Frurrj
2266 Bay Street
San Francisco, CA 94123

Ken Vaht
1 Lombard Street
San Francisco, CA 94111

Nancy & Robert Katz
2 Whiting Street
San Francisco, CA 94133

Herb Kosovitz
340 Chestnut Street
San Francisco, CA 94133

Lea Schick
1360 Montgomery Street
San Francisco, CA 94133

Anne Halstead
1308 Montgomery Street
San Francisco, CA 94133

Mrs. John E. Miller
150 Lombard Street, #705
San Francisco, CA 94111

Mr. David Dibble
28 Alta Street
San Francisco, CA 94133

Carol Schwartzback
2 Montague Place
San Francisco, CA 94133

Peg & Al Merrill
1460 Montgomery Street
San Francisco, CA 94133

Ms. Jeanne Milligan
486 Union Street
San Francisco, CA 94133

Ms. Freida Weiner, M.D.
150 Lombard Street, #206
San Francisco, CA 94111

Ms. Florence Feibusch
150 Lombard Street, Apt. 505
San Francisco, CA 94111

R.B. Wood
27 Napier Lane
San Francisco, CA 94133

ADJACENT PROPERTY OWNERS

Eric, Herbert and Helen Woods
1115 Drake Avenue
Burlingame, CA 94010

Donald and Louis Levy
785 Market Street, #500
San Francisco, CA 94103

Estelle M. Walters
1301 Sansome Street
San Francisco, CA 94111

Catherine Doliani
City Title Insurance Co.
1001 Vallejo Street
San Francisco, CA 94133

Michael P. Merrill
15 Napier Lane
San Francisco, CA 94133

Edith Hyler
8 Napier Lane
San Francisco, CA 94133

81.415E
1299 Sansome Street
Office Building
June 10, 1982

SAN FRANCISCO
CITY PLANNING COMMISSION
RESOLUTION NO. 9416

WHEREAS, A draft environmental impact report, dated April 16, 1982, has been prepared by the Department of City Planning in connection with 81.415E, 1299 Sansome Street Office Building. Construction of a 44,550 square foot office building on a 7,200 square foot lot located in a C-2 (Community Business) District after demolition of an existing single-story commercial structure, and request for a variance exempting the project from providing 70 off-street parking spaces.

on the property described as follows:

1299 Sansome Street (Assessor's Block 106, lot 1) at the southwest corner of Sansome and Filbert Streets.

WHEREAS, The Department duly filed a notice of completion of the draft report with the Secretary of the California Resources Agency, gave other notice and requested comments as required by law, made the report available to the general public and satisfied other procedural requirements; and

WHEREAS, The City Planning Commission held a duly advertised public hearing on said draft environmental impact report on May 20, 1982, at which opportunity was given for public participation and comments; and

WHEREAS, A final environmental impact report, dated June 10, 1982, has been prepared by the Department, based upon the draft environmental impact report, any consultations and comments received during the review process, any additional information that became available, and a response to any comments that raised significant points concerning effects on the environment, all as required by law; and

WHEREAS, On June 10, 1982, the Commission reviewed the final environmental impact report, and found that the contents of said report and the procedures through which it was prepared, publicized and reviewed comply with the provisions of the California Environmental Quality Act, the Guidelines of the Secretary for Resources and San Francisco requirements;

THEREFORE BE IT RESOLVED, That the City Planning Commission does hereby find that the Final Environmental Impact Report, dated June 10, 1982 concerning 81.415E, 1299 Sansome Street Office Building

is adequate, accurate and objective, and does hereby CERTIFY THE COMPLETION of said Report in compliance with the California Environmental Quality Act and the State Guidelines;

AND BE IT FURTHER RESOLVED, That the Commission in certifying the completion of said Report does hereby find that the project as proposed will have a significant effect on the environment, in that it will block views of the existing slope of Telegraph Hill.

ayes: Karasick, Kelleher, Klein, Nakashima, Rosenblatt, Salazar
noes: Bierman

APPENDIX
Final Initial Study

**FINAL INITIAL STUDY
1299 SANSOME STREET OFFICE BUILDING
81.415E**

POTENTIAL ENVIRONMENTAL EFFECTS

Potential environmental impacts associated with project implementation include: urban design, visual effects and the relation of the project to adjacent and nearby buildings, the base of Telegraph Hill, the Filbert steps, and the general context of the Northern Waterfront Historic District; and soils and geologic considerations relating to the sensitive nature of Telegraph Hill. These environmental parameters will be addressed in a focused Environmental Impact Report (EIR).

Potential environmental issues associated with the project that have been determined in this Initial Study to be insignificant, and, therefore, not to be addressed in subsequent environmental documentation for the project, are described below and discussed later in this Initial Study.

Land Use Compatibility: The proposed office use would be compatible with existing land uses in the site vicinity. The project would comply with the height and bulk and land use provisions of the City Planning Code. The project would not comply with Article 1.5, Section 155 of the City Planning Code which requires on-site parking. The project sponsor proposes to seek and justify the granting of a variance from this requirement from the City Planning Department to allow 77 spaces for off-site parking in an existing garage located within 800 feet walking distance from the project site (Article 1.5, Section 159,c,d,e).

The San Francisco Landmarks Advisory Board on July 1, 1981 resolved that the existing commercial building on the project site is not architecturally and/or historically an essential contributing part of the proposed Northern Waterfront Historic District. The Board identified design criteria for any new construction on the site; these criteria will be addressed in the subsequent Focused EIR.

Note: Since publication of the Initial Study on March 18, 1982, the proposed project has been modified to include stepped terraces on the northeast building wall, rather than include a sloping glass wall as originally proposed. See Section III.A. of the EIR, Urban Design, page 27.

Housing Impacts: The proposed project would be expected to generate a demand for 37 housing units. To date, new office development projects of less than 50,000 gross square feet have not been considered as having a significant impact on the City's housing supply.

Noise: After construction, the project would not increase day or nighttime noise levels in the project vicinity.

Public Services and Utilities: The demand for public services and utilities would not require additional personnel or equipment, with the exception of fire protection services in the case of a major fire or several fires in the downtown area.

Biology: The project would not directly affect plants or animals as the site is presently developed and is within an urbanized area.

Transportation: With an assumed occupancy of 1.2 persons per vehicle the proposed project would generate about 60 vehicle trips during the P.M. peak hour. These trips would be distributed between Sansome and Battery Streets, the primary links between the project site and the regional (and crosstown) highway network. This traffic would represent an increase of about 2-3% in the existing traffic volumes on Sansome and Battery Streets. The streets would continue to experience stable traffic flows. With cumulative projects however, Battery (near Broadway) and Sansome (near The Embarcadero) would experience congestion and unstable flows.

The proposed project would generate about 135 P.M. peak hour person-trips, all of which would involve some walking. About 70 pedestrian trips would travel along Sansome Street between the project and parking to the north. About 40-50 pedestrians would cross Sansome Street during the P.M. peak hour to access Muni and Golden Gate bus stops. The project would not degrade the quality of pedestrian flow on adjacent sidewalks and crosswalks.

The project would cause an increase of up to 2% in Muni and Golden Gate Transit load factors. Cumulative development would increase Muni load factors by 30% but the lines serving the project site would remain within their capacity. Cumulative development would bring Golden Gate lines to their capacity.

Air Quality, Wind and Shadow: The proposed project would contribute imperceptively to current violations of Bay Area air quality standards. Due to the prevailing northwesterly winds and the proximity of the site to the vertical rock wall on the east side of Telegraph Hill, the proposed project would not be expected to result in a significant change in local wind flow patterns. The proposed project would not cast shadows on the Filbert gardens or Levi's Plaza open space.

Hazards: Project operation would not increase the risk of explosion or release of hazardous substances or cause other dangers to public health and safety.

Water Quality: Project construction or operation would not affect the quality or quantity of public water or ground water in the project area.

LAND USE

Environmental Evaluation Checklist

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Would the project conflict with objectives and policies in the Comprehensive Plan (Master Plan) of the City?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
2. Would the project require a variance, or other special authorization under the City Planning Code?	<u>X</u>	<u>—</u>	<u>*</u>	<u>—</u>	<u>X</u>
3. Would the project require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal Agencies?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
4. Would the project conflict with adopted environmental plans and goals?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
5. <u>Land Use</u> . Would the proposed project:					
a. Be different from surrounding land uses?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
b. Disrupt or divide the physical arrangement of an established community?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
6. <u>Cultural</u> . Would the proposed project:					
a. Include or affect a historic site, structure, or building?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
b. Include or affect a known archaeological resource or an area of archaeological resource potential?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
c. Cause a physical change affecting unique ethnic or cultural values?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>

* Refer to page 13 of the EIR for new information; the project as revised would no longer require a variance.

SETTING

Land Use Activities and Construction

The project site is part of a larger area characteristically referred to as the Base of Telegraph Hill. The area extends along the waterfront from Broadway on the south to Bay Street on the north. The project site is within the proposed Northern Waterfront Historic District (Figure 2, page 9).

Excluding Levi's Plaza, a seven block mixed use development located in the southern part of the Base of Telegraph Hill, only one major building, Master Charge, has been built in recent years. It occupies an entire block at Front and Vallejo Streets. Most other buildings in the area occupy one-half block or less. North of Union Street, new construction in recent years has been limited to the Telegraph Landing condominiums in the block bounded by Montgomery, Chestnut, Sansome and Lombard Streets, and Wharf Plaza rental housing at Francisco and Kearny Streets.

To the northeast of the project site, at the corner of Lombard and Battery Streets, is the Merchants Ice House, which has been converted to office use. A separate garage, recently constructed west of the Merchants Ice House, provides parking for about 200 cars.

A two-story concrete warehouse on the half block south of the Merchants Ice House has been converted to a private sports club. North of the Telegraph Landing block are the recently renovated buildings of the Fibreboard Corporation, Western Contract Furnishers, and Victoria Station restaurant chain offices, and the newly built Francisco Bay office complex on Port Authority land, fronting The Embarcadero. A restaurant is located on the triangular parcel opposite the foot of Pier 27. Levi's Plaza, north and east of the project site, is currently under construction and comprises 7 blocks including office, retail, residential and parking land uses. Central to the design plans for the office complex is a landscaped pedestrian plaza on the closure of Filbert Street between Sansome Street and The Embarcadero. The office structures partially enclose the plaza, with main building entrances oriented toward it.

A parking structure consisting of 3 levels, containing space for 825 cars, is being constructed at Sansome and Lombard Streets as part of the Levi's Plaza complex (Block F, Figure 2, page 9). Each level would contain approximately 80,000 square feet, for an

approximate total of 265,000 square feet of parking space. Commercial shops, totalling approximately 5,000 square feet, will be located at street level along Sansome Street. The parking structure serves as a base (podium) for the construction of two buildings, one 9 levels and the other 4 levels, containing a total of 202 condominium dwellings and having approximately 221,000 square feet of gross floor area. The uncovered roof of the parking structure would be landscaped with trees, shrubs, and walkways. Of the 825 parking spaces provided, 211 would be reserved for the Block F condominium occupants and 77 parking spaces would be reserved for the Levi's Plaza commercial uses.

Land Use Zoning and Districts

Zoning, Special Use District No. 3. The project site is zoned C-2, Community Business District (see Section I.D., page 6, Zoning and Project Design Characteristics) and lies also within the Northern Waterfront Special Use District No. 3 (Figure 2, page 9.¹ Development in the area is subject to the general provisions outlined in the City Planning Code for C-2 districts, but these may be superceded by additional regulations imposed by the provisions of the Special Use District. The Special Use District also permits industrial and commercial operations directly relating to water-borne commerce and wholesale establishments within an enclosed building.

The west boundary of the project site joins the Telegraph Hill area, which is under different zoning restrictions, as shown in Figure 2, page 9. The two-block area surrounding Coit Tower is zoned P (Public Use), which applies to land that is owned by a government agency and is in some form of public use, including open space. Remaining areas west of the site are zoned RH-3 with dwelling structures and nonindustrial public buildings the principal permitted uses.

¹ On 19 January 1977 the San Francisco City Planning Commission adopted Resolution 7643, which amended the Master Plan of the City and County of San Francisco to include The Plan for the Northeastern Waterfront and to delete the previously adopted Northern Waterfront Plan. The new plan encompasses an area from Fisherman's Wharf to North China Basin; it was formulated to guide future development of the area in a manner consistent with the interests of San Francisco and achieve conformity with Special Area Plan No. 1: San Francisco Waterfront, prepared and adopted by the San Francisco Bay Conservation and Development Commission in 1975, as an amendment to its Francisco Bay Plan.

Historic District. The area of the northern waterfront containing the project site is a candidate for designation as a historic district because of the Gold Rush warehouses preserved from the 1906 fire. With the destruction of the North Point building (Seawall Warehouse) in 1969, it was felt that some action was needed to preserve what was left of San Francisco's earliest waterfront structures.

On 3 March 1976, the Landmarks Preservation Advisory Board¹ adopted a resolution of intent to designate the area bounded by Broadway, Lombard, The Embarcadero, and the base of Telegraph Hill, including the Project site, as a historic district. However, no further formal action has been taken and it is possible the proposed boundaries of the district may be adjusted by the Board to include less land area.² If the area were to become a historic district, the Landmarks Board would act on permit applications for demolition, new construction, additions, alterations, or exterior changes visible from a public place or thoroughfare on property within the historic district. To date, the Jackson Square Historic district (an enclave of buildings that escaped the 1906 fire) and the Webster Street Historic District are the only two such districts that have been established in San Francisco by the Board of Supervisors.

The existing structure on the project site is not considered by the Board to be an architecturally or historically contributing building in the proposed historic district.² However, two buildings within the project area have been noted by the Landmarks Board for their architectural and historic significance. They are the Italian Swiss Colony Building on the corner of Greenwich and Battery Streets, and the Cargo West Building on the corner of Union and Battery Streets.

The existing bluff of Telegraph Hill on the west margin of the project site is the result of quarrying operations that began in about the year 1852 for filling the shoreline.³ Bedrock therefore underlies the existing building on the site and the absence of fill on the site would preclude the presence of a buried hulk on the site.

¹Established by the City Planning Commission and the Board of Supervisors to act in an advisory capacity to preserve historic, architectural, and aesthetic landmarks.

²Jonathan Malone, San Francisco Department of City Planning, Secretary to the Landmarks Preservation Advisory Board, telephone conversation, 16 October 1981.

³Levi's Plaza, Final Environmental Impact Report EE 77.256, Certified 14 December 1978, page 75, Setting, Historical and Archaeological Resources.

IMPACTS

Project Compatibility with Comprehensive Planning

The proposed project would conform to the height and bulk requirements of the Planning Code (see Section I.D. page 6, Zoning and Project Design Characteristics). The project would require a variance to allow the use of an existing parking garage to provide the required 77 off-street parking spaces (PLEASE NOTE AMENDMENT IN EIR). The project sponsor would petition the Police Commission to approve the installation of a yellow curb freight loading space on Filbert Street.

The Plan for the Northeastern Waterfront contains general objectives and policies to be applied to the entire waterfront and more specific policies for the Base of Telegraph Hill area. General objectives relevant to the proposed project include:

Land Use. Objective I: "To develop and maintain activities that will contribute significantly to the city's economic vitality and provide additional activities which strengthen the predominant uses in each sub-area of the northeastern waterfront, while limiting the concentration to preserve the environmental quality of the area."¹

Commerce. Objective: "To develop limited additional office and commercial space in order to serve the city's economic needs and to encourage a mixture of uses and activities along the northeastern waterfront."²

In addition to the more general area-wide objectives of the Northeastern Waterfront Plan, there are land use and design objectives and policies for the Base of Telegraph Hill area, contained in the Plan. There are also a number of policies contained in the Urban Design Plan of the San Francisco Comprehensive Plan which would relate to the project area and the proposed building.³ These objectives and policies will be discussed in subsequent environmental documentation for the project.

¹ San Francisco Department of City Planning, Northeastern Waterfront Plan, The Comprehensive Plan of the City and County of San Francisco, page 10.

² San Francisco Department of City Planning, Urban Design Plan, adopted by Resolution 6745 of the San Francisco City Planning Commission, 26 August 1971, page 13.

³ San Francisco Department of City Planning, adopted by Resolution 6745 of the San Francisco City Planning Commission, 26 August 1971.

VISUAL QUALITY

Environmental Evaluation Checklist

Would the proposed project:	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Obstruct or degrade any scenic view or vista open to the public?	—	<u>X*</u>	—	—	<u>X</u>
2. Reduce or obstruct views from adjacent or nearby buildings?	—	<u>X*</u>	—	—	<u>X</u>
3. Create a negative aesthetic effect?	—	<u>X*</u>	—	—	<u>X</u>
4. Generate light or glare affecting other properties?	—	<u>X*</u>	—	—	<u>X</u>

*These were erroneously checked no in the published Initial Study.

IMPACTS

Long Range Views

City Pattern Policy 1: "Recognize and protect major views in the City with particular attention to those of open space and water."¹

Objective 5: "To develop the area in such a way as to preserve and enhance the physical form of the waterfront and Telegraph Hill, and to preserve views from the hill."²

The proposed structure would rise 84 feet to the top of the parapet which would rise 2½ feet above the roof.³ The 84-foot height is measured by the project architects from the surface of Sansome Street which bounds the east margin of the site. The building height permitted by the Planning Code would be measured from the median elevation of the site at the center of the lot, which slants upward toward the hill from Sansome Street; the top of the structure would therefore be 1½ feet below the permitted 84-foot height limit. All mechanical equipment including elevator drive mechanisms would be contained within the building's interior; no mechanical penthouses would be constructed on the roof.

¹Urban Design Plan, page 10.

²Northeastern Waterfront Plan, page 13.

³Parapet: a low wall extending around the perimeter of a roof.

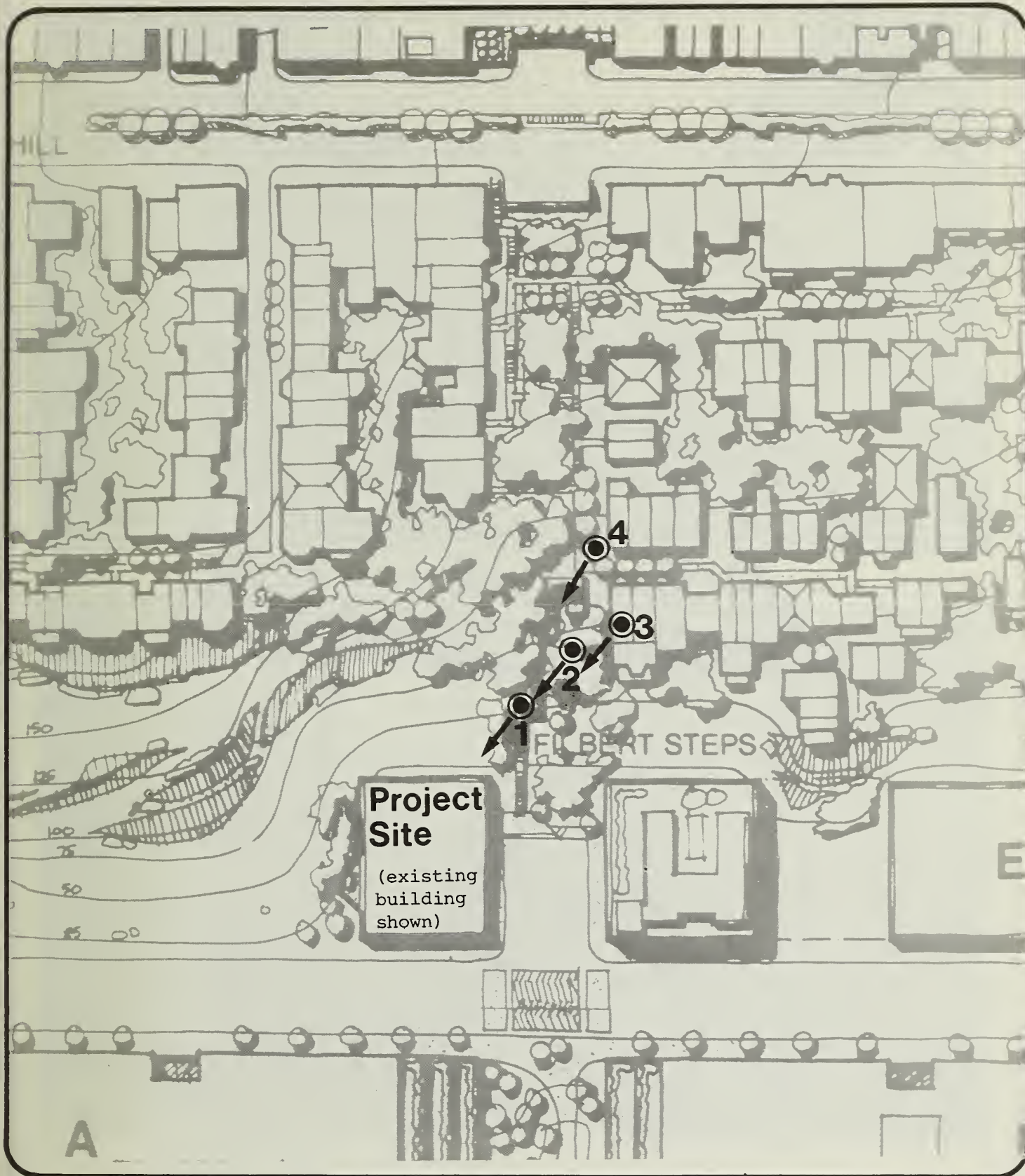
Figures 22, 23, 24, pages A-13, A-14, A-15 depict how views near the project site would be affected by the proposed building. From Observer Point 1 (Figure 23, page A-14), views of the Levi's Plaza structure at Sansome and Union Streets would be partially obstructed, as well as portions of the sky. Views toward the Bay would not be obstructed by the proposed building due to the presence of other structures in the area which block views to the east from Observer Point 1 on the Filbert Street steps.

Higher on the steps (Observer Points 2 and 3), Figure 24, page A-15, the structure would continue to obstruct views to the Levi's Plaza building, but would not block views to the Bay, Bay Bridge or San Francisco skyline in the background. This would also be true from Observer Point 4 (Figure 11, page 30). Some of the plant materials on Telegraph Hill that would screen views of the structure are deciduous and lose their foliage in the winter; therefore, during winter months, views of the proposed structure would be more pronounced than during the summer months from various locations on Telegraph Hill when all plant materials would have full foliage.

As shown in Figures 23, 24, 25, pages A-14, A-15, A-16, views of the project would vary with respect to observer location on the hill and the amount of foreground foliage at each observer location which would screen the structure. From a visual standpoint, the project would extend the area development pattern closer to Telegraph Hill, becoming a foreground element to views of the area from hillside locations. Existing, exposed slopes of the hill adjacent the project site would be screened from view from Levi's Plaza (Figure 11) and from travelers along Sansome Street.

Objective 2: "To develop a diversity of additional activities which would strengthen the existing predominant uses in the base of Telegraph Hill area and activities which would expand the period of use, but of an intensity which would provide a relief from the adjacent downtown and Fisherman's Wharf areas."¹

¹Northeastern Waterfront Plan, page 30.



Observer Point Locations (See Figures 23, 24 and 25)

Source: H.O.K. Associates

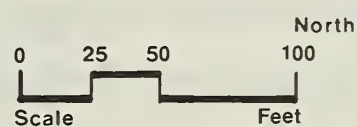


Figure No. 22



View from landing at midpoint of Filbert Street steps.

Photomontage: Building Viewed from Observer Point 1

Source: H.O.K. Associates

Figure No.23



View from upper landing of Filbert Street steps.



View from residence below intersection of Filbert Street steps and Napier Lane.

Photomontage: Building Viewed from Observer Points 2 and 3

Source: H.O.K. Associates

Figure No. 24



View from residence above intersection of Filbert Street steps and Napier Lane.



View from Levi's Plaza at Battery Street.

Photomontage: Building Viewed from Observer Points 4 and 5

Source: H.O.K. Associates

Figure No. 25

The proposed project would not add a land use that is unique to the area, but would replace retail use of the site with office use. Office use in the area would therefore be strengthened. The structure would be less in gross square feet than the buildings opposite the site (Levi's Plaza) along the east side of Sansome Street. The structure would be equal in height to the building at the northeast corner of Sansome and Union Streets, two stories higher than the building at the southeast corner of Sansome and Greenwich Streets and five stories less in height than the residential condominium structure under construction at the southwest corner of Lombard and Sansome Streets. The structure would be about equal in length and width to the Walter's warehouse and penthouse opposite the site on the north side of Filbert Street, about 30 to 40 feet taller than the warehouse portion of the building and about as high as the smaller penthouse which rises above the warehouse. The project may therefore be viewed as a structure of less bulk than most surrounding buildings while incrementally increasing the intensity of land use at the Base of Telegraph Hill. The building would serve as a structural mass aiding in the visual transition between larger buildings of the Levi's Plaza project and dwelling units and apartment buildings on the upper portions of Telegraph Hill.

Conservation Policy 6: "Respect the character of older development nearby in the design of new buildings."¹

Conservation Policy 7: "Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character."¹

The visual form and character of the project area near the Base of Telegraph Hill has been modified and currently is being modified by the construction of Levi's Plaza, encompassing a seven-block area (Figure 2, page 9 . Office buildings constructed along Sansome Street east of the project site have been surfaced with red-brown brick tiles respecting the characteristic brick construction of the preserved Cargo West Building, the Italian Swiss Colony Building, and other older structures south of Union Street such as the renovated Ice House at the southeast corner of Union and Sansome Streets.

¹ Urban Design Plan, pages 25 and 37. Policy 7 in this case refers to the corner of Telegraph Hill.

As expressed by the project architects, the proposed structure is being designed to complement rather than repeat or visually compete with the office buildings and spaces of Levi's Plaza and the garage and condominium structures at Sansome and Lombard Streets.¹

At the regular meeting of the Landmarks Preservation Advisory Board on 1 July 1981, during a presentation of the project by representatives of the project sponsor, it was noted by the Board that "the area is being built up with a great deal of brick, and that another material would be refreshing."²

The building's exterior walls would be fabricated from precast concrete panels with the windows set in from the building's outer walls visually defining the spandrels³ on the north, east and south sides of the building (Figures 6 and 7, pages 15 and 16). Shadows cast by the spandrels would emphasize the presence of windows on the building's south and east-facing walls. The concrete surfaces would be sandblasted to create a texture similar to the stucco surfaces of the existing structure and portions of the Walters' warehouse and penthouse opposite the site on Filbert Street. The concrete would contain a light buff or beige color similar to the light earth-tone colors of the rock face of Telegraph Hill bordering the west margin of the site. The use of concrete would visually relate to the concrete surfaces of the garage and condominium towers at Lombard and Sansome Streets. The roof of the structure would be surfaced with a light buff colored gravel to complement the color of exterior portions of the building.

¹Memorandum to EIP Corporation from HOK Associates, Bob Canfield, project architect, 22 October 1981.

²Landmarks Preservation Advisory Board, Minutes of the Regular Meeting, 1 July 1981, Mr. Choy.

³Spandrel: In a multi-story building, a panel-like area between the top of a window on one level and the sill (base) of a window in the story above.

The major design feature of the building would be the sloped, glass wall originating at the second level and extending to the roofline. The sloping glass wall would orient toward the intersection of Filbert and Sansome Streets), allowing building occupants views of the Levi's Plaza courtyard and portions of the Bay beyond, and buildings along Sansome Street north of the project site. The sloping glass wall would serve to reduce the apparent mass of the structure and serve to emphasize the intersection of Sansome and Filbert Streets. (PLEASE NOTE THAT THIS SLOPING GRASS WALL DESIGN HAS BEEN CHANGED AND THE EIR DISCUSSES THE NEWLY PROPOSED DESIGN.)

Windows of the structure would be a light-grey tinted glass, similar to the grey tinted glass of the Levi's Plaza office buildings, set in grey aluminum window frames. Excluding the sloping glass wall where it would join with the building walls, the corners of the building would be rounded, repeating the rounded building corners of the Levi's Plaza office buildings. The structure's west-facing wall would contain a planting receptacle at the sixth floor level constructed between the rounded building corners (Figure 1, page 8) for the installation of vines to cover the building side for views from Telegraph Hill residents. The west-facing building wall would project five feet outward at the third floor level (Figure 6, page 15) to coincide with the west property line and would contain no windows to avoid direct night light transmission towards neighboring residences. Incandescent lights (electrical lamps with standard light bulbs) would be used in office spaces behind the sloping glass wall described above to maintain a "residential" appearance to light that would emanate from that portion of the structure avoiding light and glare to neighboring properties; fluorescent light that would completely fill offices with light behind the sloping glass wall would not be used. All other windows would be fitted with narrow-slat Venetian (Levelor) blinds. Lights in interior spaces would automatically be turned off at night when office spaces would not be in use to avoid point sources of light or potential glare from interfering with views from residents above the building on Telegraph Hill, occupants of the Walters' Warehouse penthouse and Telegraph Landing condominiums. Because the building's glass wall slopes to the northeast, generally away from the sun, it is not expected that the glass wall would generate sunlight glare on adjacent residential units. However, this aspect of the structure will be studied further in the subsequent focused EIR to be prepared.

Policy 6: "Encourage the provision of landscaping and publicly accessible open space in new development in the base of Telegraph Hill area."¹

¹ Northeastern Waterfront Plan, page 30.

As the project site is rather small (7,200 gross square feet), the proposed building would occupy the full lot area as does the structure which currently occupies the site. Public open space would not be removed from the project area nor is any proposed as a result of the project. Street trees would be provided along the front of the building along Sansome Street. The section of Filbert Street adjacent the project site between Sansome Street and Telegraph Hill would be planted with street trees and parking spaces restriped to serve the needs of area residents. The lower landing of the Filbert Street steps (linking Filbert Street to Montgomery Street) would be relocated several feet to a location to be determined for uninterrupted use to accommodate construction of the building. The existing earthen bank near the foot of the Filbert Street steps would be planted with flowering shrubs. The treatment of the Filbert Street Steps during and after construction will be addressed in detail in the subsequent focused EIR to be prepared.

ECONOMICS/POPULATION/HOUSING

Environmental Evaluation Checklist

Would the proposed project:	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Alter the density of the area population?	<u>X</u>	—	—	—	<u>X</u>
2. Have a growth-inducing effect?	—	—	<u>X</u>	—	—
3. Require relocation of housing or businesses, with a displacement of people, in order to clear the site?	<u>X</u>	—	—	—	<u>X</u>
4. Create or eliminate jobs during construction and operation and maintenance of the project?	<u>X</u>	—	—	—	<u>X</u>
5. Create an additional demand for housing in San Francisco?	<u>X</u>	—	—	—	<u>X</u>

Relocation of Present Business

King's Antiques, which previously occupied the project site, employed the owner and one part-time person, and vacated the existing building at the end of the lease term on 15 January 1982.

King's Antiques did not require the project sponsor's assistance in vacating the site. The sponsor offered to extend the lease at the current lease monthly rate on a month-to-month basis. It is not known where King's Antiques relocated, or if the company remained in business at a new location.

Employment and Rental Rates

The project would have the following employment/occupancy characteristics:

<u>Firm Name</u>	<u>Proposed Rentble Sq.Ft. Occupancy</u>	<u># of Employees</u>	<u>Estimated Employee Annual Income Level</u>	<u>Annual Payroll</u>
Gerson-Bakar & Associates	9,000	25	\$21,000	\$ 525,000
Wilsey-Bennett Company	9,300	30	30,000	900,000
Proposed Law Firm	15,000	60	25,000	1,500,000
Proposed 1st floor commercial tenant (or office)	5,400	20	15,000	300,000

Source: Gerson Bakar and Associates

Since the building will be occupied and owned primarily by Gerson Bakar & Associates and the Wilsey-Bennett Company, it is difficult to state actual rental rates. It is projected that the occupancy cost (mortgage expense and building operating costs) to the two firms would approximate \$25-\$28 per gross square feet of office space per year. If a law firm or other outside business rents space within the building, it is projected that the rental rate would approximate \$28 per gross square feet per year.

The project would increase the daytime population within the project area by about 135 workers. Based on the Department of City Planning Formula, derived from Department housing generation statistics, the project would generate a demand for 39 dwelling units in San Francisco. To date, new office development projects of less than 50,000 gross square feet (and generating a demand for less than 45 housing units), have not been considered as having a significant impact on the City's housing supply.

TRANSPORTATION

Environmental Evaluation Checklist

Would the construction or operation of the project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Change in use of existing transportation systems? (transit, roadways, pedestrian ways, etc.)	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>X</u>
2. An increase in traffic which is substantial in relation to existing loads and street capacity?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
3. Effects on existing parking facilities, or demand for new parking?	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>X</u>
4. Alteration to current patterns of circulation or movement of people and/or goods?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>X</u>
5. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>	<u>X</u>
6. A need for maintenance or improvement or change in configuration of existing public roads or facilities?	<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>	<u>—</u>
7. Construction of new public roads?	<u>—</u>	<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>

SETTING

Street Network

The project site is served by the north/south, one-way couplet of Sansome and Battery Streets which provide north-south access (Sansome is one-way northbound and Battery is one-way southbound). To the south, Broadway provides an east/west crosstown link and Bay Street has a similar function north of the site. Sansome, Battery, Broadway and Bay

are all designated "Major Thoroughfares"¹ in the Transportation Element of the City's Comprehensive Plan. Sansome and Battery Streets have also been designated "Transit Preferential Streets"² in the City's Comprehensive Plan.

Traffic counts conducted by the City³ and EIP⁴ are shown in Table I.

TABLE I

<u>Street</u>	<u>Daily Volume</u>	<u>P.M. Peak Hour Volume*</u>	<u>Date of Count</u>
Sansome/(north of Union)	10,940	905	5/31/78
Sansome (north of Union)	N /A	860	10/13/81
Battery (north 8,800 of Union)	660	6/5/78	
Battery (north of Union)	N /A	635	10/13/81

*The evening commute period (4:30-6:00 P.M.) contained the highest volume hour of the day for both streets.

On both Sansome and Battery these volumes reflect stable traffic flow conditions associated with Level of Service 'C' or better⁵ (two-lane streets can accommodate about 1,200 hourly vehicles at stable flows). The counts indicate volumes have remained relatively stable over the past three years. (It is recognized, however, that volumes probably vary 10+% on a day-to-day basis).

¹ Defined as "crosstown thoroughfares whose primary function is to link districts within the City and to distribute traffic from and to the freeways.

² Defined as "an important street for transit operations where interference with transit vehicles by other traffic should be minimized."

³ Counts conducted by Traffic Engineering Division, San Francisco Dept. of Public Works on 31 May 1978 and 5 June 1978.

⁴ Counts conducted by EIP Corporation on 9 October and 13 October 1981.

⁵ Institute of Transportation Engineers, Transportation and Traffic Engineering Handbook, Englewood Cliffs, N.J., 1976, p. 338. Service level definitions are included in the Appendix.

Access to/from the Peninsula and the East Bay is available via freeway ramps at Broadway/Sansome and Broadway/Battery. Access to/from the North Bay is more circuitous, reflecting surface street access on The Embarcadero and Bay Street. The regional highway network now experiences congested conditions. The downtown freeway network currently operates at the jammed conditions of service level E-F.¹

Transit Service

The project site is served by MUNI lines and Golden Gate Transit lines (Figure 26, page A-26). Muni lines 32 and 42 are currently operating with average p.m. peak hour load factors of 0.30 and 0.50 in the vicinity of the proposed project (see pages A-27 - A-29 Transit Impacts, for further discussion).

Pedestrian/Bicycle Facilities

The project site is adjacent to the Filbert Street steps which link the project area with Telegraph Hill. During both the midday and P.M. peak hour periods the sidewalks in the area were observed to operate with unimpeded flow.²

Both Sansome and Battery Streets are designated bicycle routes in the Transportation Element of the San Francisco General Plan.

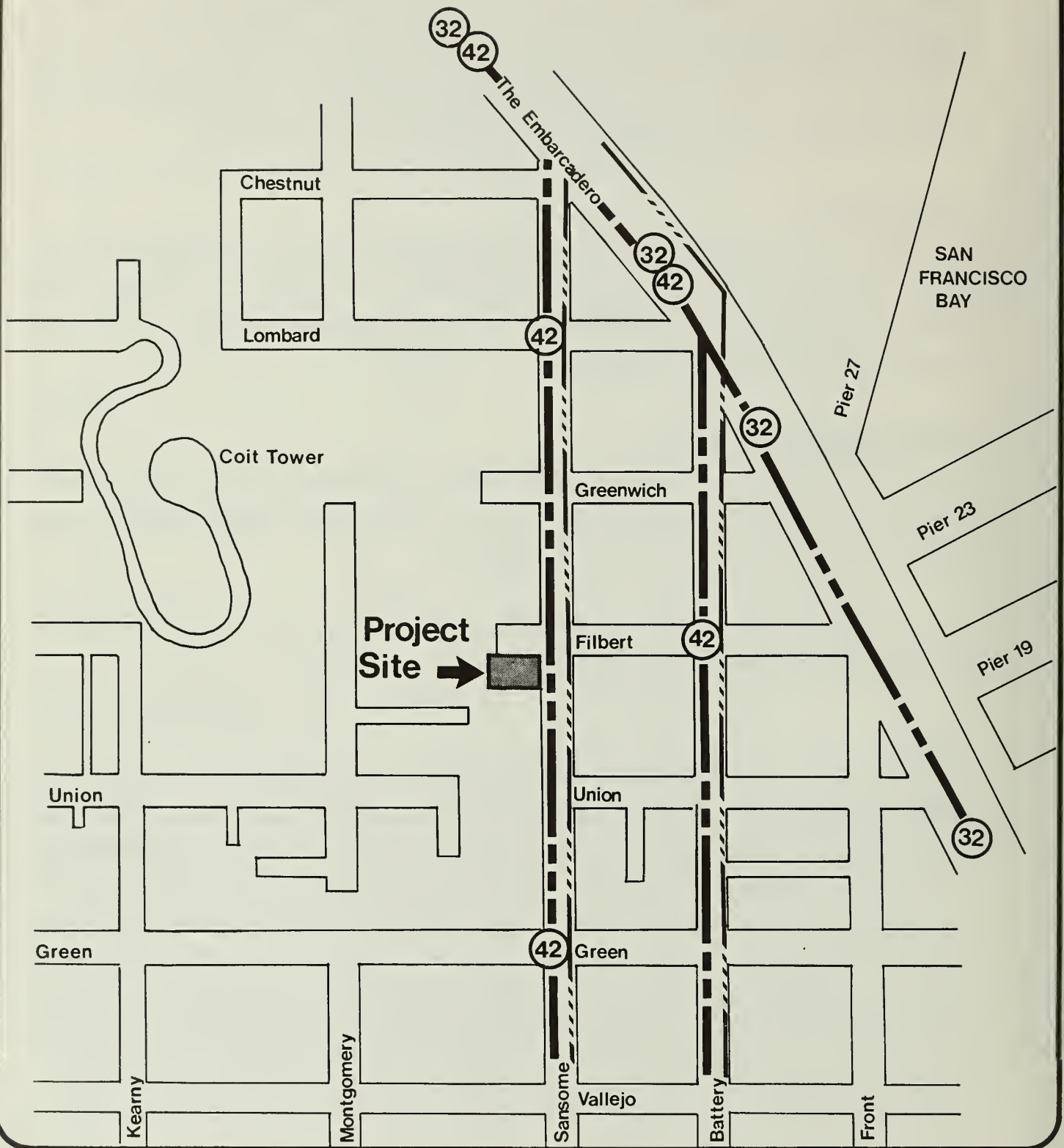
Parking

The project site is in an area of high parking demand. Prior to the initiation of the Levi's Plaza development, the area's off-street parking facilities were about 80% occupied.³ The Levi's Plaza project will provide about 700 parking spaces (the City's code requirement) and the 600 existing parking spaces will be eliminated by that development. The elimination of these spaces combined with the parking demand by Levi's Plaza development probably will result in 100% utilization of the available parking facilities in the area. Commuters and visitors will probably seek curb parking and off-street parking which is further distant from the Levi's Plaza development. This parking is further than the maximum acceptable walking distance of 800 feet (parking place to destination) for visitors and 2,000 feet for employees (OER guidelines).



¹Len Newman, Chief, Highway Operations, Caltrans, telephone conversation, 7 August 1981.

²Field review conducted by EIP Corporation, 9 October and 13 October 1981.

³San Francisco Department of City Planning, Levi's Plaza FEIR, EE 77.256, San Francisco, certified 14 December 1978.



Existing Transit Service

Legend:  Muni Route
 Golden Gate Service

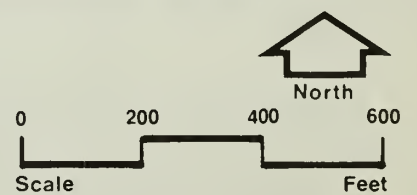


Figure No. 26

Curb parking along Sansome, Lombard and other streets north of the project site is controlled by residential permit parking (district A). Without a residential permit, these curb spaces are limited to two-hour parking. During field reviews¹ of the site, however, it appeared that curb spaces are frequently occupied by long-term employee parking. This long-term parking is probably a result of employees moving their cars throughout the day and limited enforcement of the two-hour limit.

IMPACTS

Trip Generation

Based on trip generation guidelines established by the City² the project would generate about 680 daily person trips and 135 person trips during the PM peak hour. The City also has identified modal split characteristics for downtown office development.³ These guidelines suggest that about 36% of an office development's person trips are via auto. It is recognized, however, that the project site is not as extensively served by public transit as the downtown. In addition, discussions with the project sponsor indicate about 75% of the project sponsor's 40-45 employees travel via auto.⁴ The higher driving ratio for the project sponsor's employees is probably a result of their current office location (in the North Beach area) being less accessible to public transit. The employees' relocation to the proposed project would probably result in a reduction in auto driving. Based on these factors, the ratio of transit travel has been estimated at 50% and the total project's P.M. peak hour trip distribution has been calculated in Table 2.

TABLE 2

50% auto	= 70 person-trips
35% Muni	= 45 person-trips
10% Golden Gate/BART	= 15 person-trips
5% walk	= 5 person-trips
	135

¹Field reviews conducted by EIP Corporation on 9 October and 13 October 1981.

²San Francisco Dept. of City Planning, Guidelines for Environmental Evaluation - Transportation Impacts, San Francisco, July 1980, revised November 1980.

³Ibid.

⁴Don Wyler, Gerson Bakar Associates, telephone conversation, 13 October 1981. (The 40-45 employees includes Gerson Baker Associates and Wilsey-Bennett Company).

Street Network

With an assumed occupancy of 1.2 persons per vehicle the proposed project would generate about 60 vehicle trips during the P.M. peak hour. These trips would be distributed between Sansome and Battery Streets, the primary links between the project site and the regional (and cross-town) highway network. This traffic would represent an increase of about 2-3% in the existing traffic volumes on Sansome and Battery Streets. The streets would continue to experience stable traffic flows.

The Levi's Plaza development will result in a cumulative impact on the area's streets. The office portion of that development is about one-half occupied and none of the residential units has been completed.¹ With the completion of this development, about 450 vehicle trips will be added to the street network during the P.M. peak hour.² A residential project (Wharf Plaza) containing 225 elderly housing units also is under consideration at Kearny/Francisco, about 6 blocks northwest of the project site.³ The project would add 30-50 vehicle trips during the P.M. peak hour.⁴

The addition of this traffic would increase volumes on Sansome and Battery Streets by an additional 15-25%. With this added traffic, Battery (near Broadway) and Sansome (near The Embarcadero) probably would experience congestion and unstable flows⁵ (Service levels E-F). Other segments of Sansome and Battery would continue to operate satisfactorily (service level C or better).

On the downtown freeway network, congestion will worsen as a result of the downtown development which has been approved but not yet built.

Transit Service

As shown in Table 2, the proposed project would generate about 45 peak hour trips on Muni. Muni lines 32 and 42 currently are operating with P.M. average peak hour load factors⁶ of 0.30 and 0.50 in the vicinity of the proposed project.⁷ With cumulative

¹Don Wyler, Gerson Bakar Associates, telephone conversation, 13 October 1981.

²San Francisco Dept. of City Planning, Final EIR Levi's Plaza, (EE 77.256), page 102, certified 14 December 1978.

³Don Wyler, Op. cit.

⁴225 units x 4 person-trips daily x 12% peak hour x 30-50% auto mode= 30-50 vehicle trips

⁵San Francisco Dept. of City Planning, Final EIR Levi's Plaza, (EE 77.256), page 102, certified 14 December 1978.

⁶Load factor = ridership/capacity; capacity is defined as 150% of vehicle seating.

⁷Charles Romeyn, Scheduling Dept., S.F. Muni Railway, telephone conversation, January 20, 1982.

downtown development (approved through October 1981, but not yet built) patronage on downtown Muni lines would increase by about 30% and these load factors will be about 0.40 and 0.70, respectively. (These cumulative impacts include Levi's Plaza.) A portion of the project ridership probably would be toward the downtown and therefore would not add to the peak outbound ridership. With the assumption that one-half to two-thirds of the project ridership would be in the outbound direction, the load factors would increase by about 1-2%. The cumulative effect of the residential development at Kearny/Francisco would be a further increase of 0.5-1.0% in the load factors. Both lines would remain well within their capacity.

Golden Gate Transit¹

Golden Gate Transit operates 147 buses out of the downtown area during the afternoon peak hour; about 120 buses on the Financial District routes serve the project site. On the average, these buses run at their design capacity level as set by Golden Gate policy, i.e. at seating capacity. Golden Gate Transit allows a maximum capacity of 55 passengers per bus (45 seats plus 10 standees) which equates to 8,085 peak hour riders on the 147 buses. Current peak hour ridership out of downtown is estimated at 6,620 passengers. It should be noted that on certain peak runs, more than 10 standees may be present.

The proposed project would add about 5-10 persons to this ridership and the impact of this increase on 120 buses would be negligible. The cumulative ridership of downtown development approved through July 1981, but not yet built (including Levi's Plaza) would be an additional 1,375 peak hour passengers. This increase (about 20-25% over existing levels) would result in standees on many of the outbound runs.

Pedestrian Impacts

The proposed project would generate about 135 P.M. peak hour person-trips, all of which would involve some walking. About 70 pedestrian trips would travel along Sansome Street between the project and parking to the north. About 40-50 pedestrians would cross Sansome Street during the P.M. peak hour to access MUNI and Golden Gate bus stops. The project would not degrade the quality of pedestrian flow on adjacent sidewalks and crosswalks.

¹ Alan Zahradnik, Planner, Golden Gate Transit, telephone conversation, 27 March 1981.

Parking

The San Francisco Planning Code indicates 77 parking spaces would be needed for the proposed project. The project sponsor would provide these spaces within a parking garage now being built at the southwest corner of Sansome and Lombard Streets (about 600-800 feet north of the project site). The project sponsor has reached an agreement with Blue Jeans Equities West, owner of the adjacent Levi's Plaza project. The agreement provides the project sponsor with the right to park up to 77 cars (under a 65-year lease term).^{*} Included within this parking supply would be spaces for van pools and for handicapped, and an area for bicycles. These spaces would be an addition to the spaces previously approved for the Levi's Plaza development. (The 77 parking spaces would be provided by converting an area which was originally designed as a storage area for computer records. The computer firm no longer desires this space and the area is presently surplus.)

It is recognized that the Northeastern Waterfront Plan discourages provision of long-term parking for employee use. The Plan's stated objective and policy with respect to parking are as follows:

Objective: "To facilitate the movement of people and goods within the northeastern waterfront in such a way as to minimize the adverse impact of this movement.

Policy: "Limit additional parking facilities in the Northeastern Waterfront and minimize the impact of this parking. Discourage long-term parking for work trips which could be accommodated by transit. Restrict additional parking to meet needs of additional business, retail, restaurant, marina, and entertainment activities; and (2) long-term parking facility for maritime activities, hotel and residential uses. To the extent possible, locate parking away from the areas of intense pedestrian activity."

Based upon generation rates established by the City,¹ the project would generate about 7-8 truck visits daily. The Planning Code would not require off-street freight loading as a part of the project. The project sponsor would, however, petition the Police Commission to approve installation of a yellow curb freight loading space on Filbert Street.

¹William Marconi, Senior Traffic Engineer, San Francisco Department of Public Works, "Commercial Vehicles in a Large Central Business District," no date, Figures 6-9. Available for public review at the Office of Environmental Review, 45 Hyde Street.

^{*}Refer to page 13 of the EIR for new information regarding project parking.

The project's 77 parking spaces would be available to project employees, visitors and the public.¹ Monthly rental rates would be charged project employees and visitors or the public would pay the existing hourly rate. Management of the project's parking would be the responsibility of the same entity which manages other Levis Square parking facilities.

Construction Process

The project construction would take about one year. During this period construction activity could encroach on to the sidewalk and curb parking areas, temporarily disrupting pedestrian travel and removing curb parking adjacent to the site.

MITIGATION

Parking

To reduce the use of curb spaces by employees, it is recommended that increased parking enforcement be instituted in the project area.

¹Don Wyler, Gerson Bakar Associates, telephone conversation, February 17, 1982.

AIR QUALITY, WIND, NOISE AND SHADOW

Environmental Evaluation Checklist

<u>Air Quality Wind, Shadow.</u> Would the proposed project result in:	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Violation of any ambient quality standard or contribution to an existing air quality violation?	<u>X</u>	—	—	—	<u>X</u>
2. Exposure of sensitive receptors to air pollutants?	—	—	<u>X</u>	—	<u>X</u>
3. Creation of objectionable odors?	—	—	<u>X</u>	—	—
4. Burning of any materials including brush, trees, or construction materials?	—	—	<u>X</u>	—	—
5. Alteration of wind, moisture, or temperature (including sun shading effects), or any change in climate, either locally or regionally?	—	<u>X</u>	—	—	<u>X</u>

Noise

1. Would the proposed project result in generation of noise levels in excess of those currently existing in the area? (during construction)	—	<u>X</u>	—	—	<u>X</u>
2. Would existing noise levels impact the proposed use?	—	—	<u>X</u>	—	<u>X</u>
3. Are Title 25 Noise Insulation Standards applicable?	—	—	<u>X</u>	—	—

IMPACTS

Air Quality

Construction activity could affect air quality in the vicinity of the project site due to dust generated by building demolition and site grading. There also would be emissions of

carbon monoxide, hydrocarbons, and oxides of nitrogen from the operation of construction machinery. These emissions would not be expected to result in violations of air quality standards.

The operation of the proposed facility would increase traffic at adjacent intersections by less than 5%, which would not result in a measurable increase in local pollution levels. The impact of the project on regional levels, due primarily to increases in regional vehicles miles traveled (VMT), would not be measurable; based on 300 trips averaging 20 miles in length per day, an increase in total regional VMT of less than .01% results. However, in conjunction with other projects, the proposed project would contribute to cumulative impacts which would increase the potential magnitude or frequency of violations of air quality standards.¹

Wind

Telegraph Hill, with an elevation of about 275 feet above sea level, helps determine the microclimate of the project area by decreasing windspeeds in its southwestern area and causing the westerly winds coming off the Pacific Ocean to flow from a northwesterly direction across the site area.

Due to prevailing northwesterly winds, and the proximity of the site to the vertical rock wall on the east side of Telegraph Hill, the proposed project would not be expected to result in a significant change in local wind flow patterns.

Noise

Existing noise levels in the area are dominated by traffic (automobiles, trucks, and buses). Secondary sources are occasional trains on the Belt Line Railroad, aircraft overflights and construction noise. Measurements made at 3 locations in the vicinity of the project

¹ The project site is located about 2 miles north of the air quality monitoring station operated by the Bay Area Air Quality Management District (BAAQMD) at 900 23rd Street. Data collected at this location show that the air quality is relatively good in San Francisco; in 1980, only the Total Suspended Particulate (dust) air quality standard was violated. (Bay Area Air Quality Management District, Air Currents, Vol. 24, No. 3, San Francisco, March 1981.)

site in 1977 indicated Ldns¹ of 63 dBA, 64 dBA, and 58 dBA, respectively.² The Environmental Protection Element of the San Francisco Comprehensive Plan contains guidelines for determining the compatibility of various land uses with different noise environments. Since office development is ordinarily considered acceptable in environments with Ldn less than 65 dBA,³ the proposed project is within acceptable limits.

The noise impacts of the proposed project would be due to construction, operation of mechanical equipment including heating, cooling, ventilation and elevator systems, and traffic generated by the proposed facility.

Project construction would take approximately 13 months and would involve removal of the existing structure, preparation of the site, and construction of the proposed structure. These activities temporarily would result in noise levels in excess of those currently at the site vicinity.

The San Francisco Noise Ordinance⁴ limits noise emissions from powered construction equipment other than impact tools to 80 dBA at 100 feet. The steel frame of the building would for the most part be welded, but there would be some connections requiring the use of impact wrenches. Although the use of impact tools would not include pile driving, noise levels at residences which are within about 100 feet of the project site, including the Walter's Warehouse penthouse, would occasionally reach 89 dBA during use of impact tools during framing of the building, and 74 dBA at other times. This would be expected to result in interior noise levels in residences within 100 feet distance of the project site

¹Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noise (noise between 10 P.M. and 7 A.M. is weighted 10 dBA higher than daytime noise).

dBA is the measurement of sound in units of decibels (dB). The "A" denotes the A-weighted scale which stimulates the response of the human ear to various frequencies of sound.

²Department of City Planning, EIR, Levi's Plaza, EE 77.256, certified 14 December 1978.

³City of San Francisco Comprehensive Plan, Environmental Protection Element, Transportation Noise Section, adopted by City Planning Commission in Resolution 7244, 19 September 1974.

⁴San Francisco Noise Ordinance (Section 2907(b), San Francisco Municipal Code part II, Chapter VIII, Section I, Article 29, 1972.

of 74 dBA and 59 dBA, respectively, with windows open, and 59 dBA and 44 dBA, respectively, with windows closed. Generally noise levels above 60 dBA interfere with normal speech; therefore the expected noise due to construction would be expected to occasionally annoy and distract residents within 100 feet of the project site at periodic intervals. Framing of the building would be expected to take about five weeks.¹ Residents away from the project site along upper Filbert Street and near the top of Telegraph Hill would not be expected to be adversely affected due to construction noise, to the degree residents within 100 feet of the project site would be affected. Noise levels in dBA would be reduced as one would move further from the project site, and the amount of noise reduction would vary with respect to receiver location, intervening structures between the receiver and project site, climatic and wind conditions.

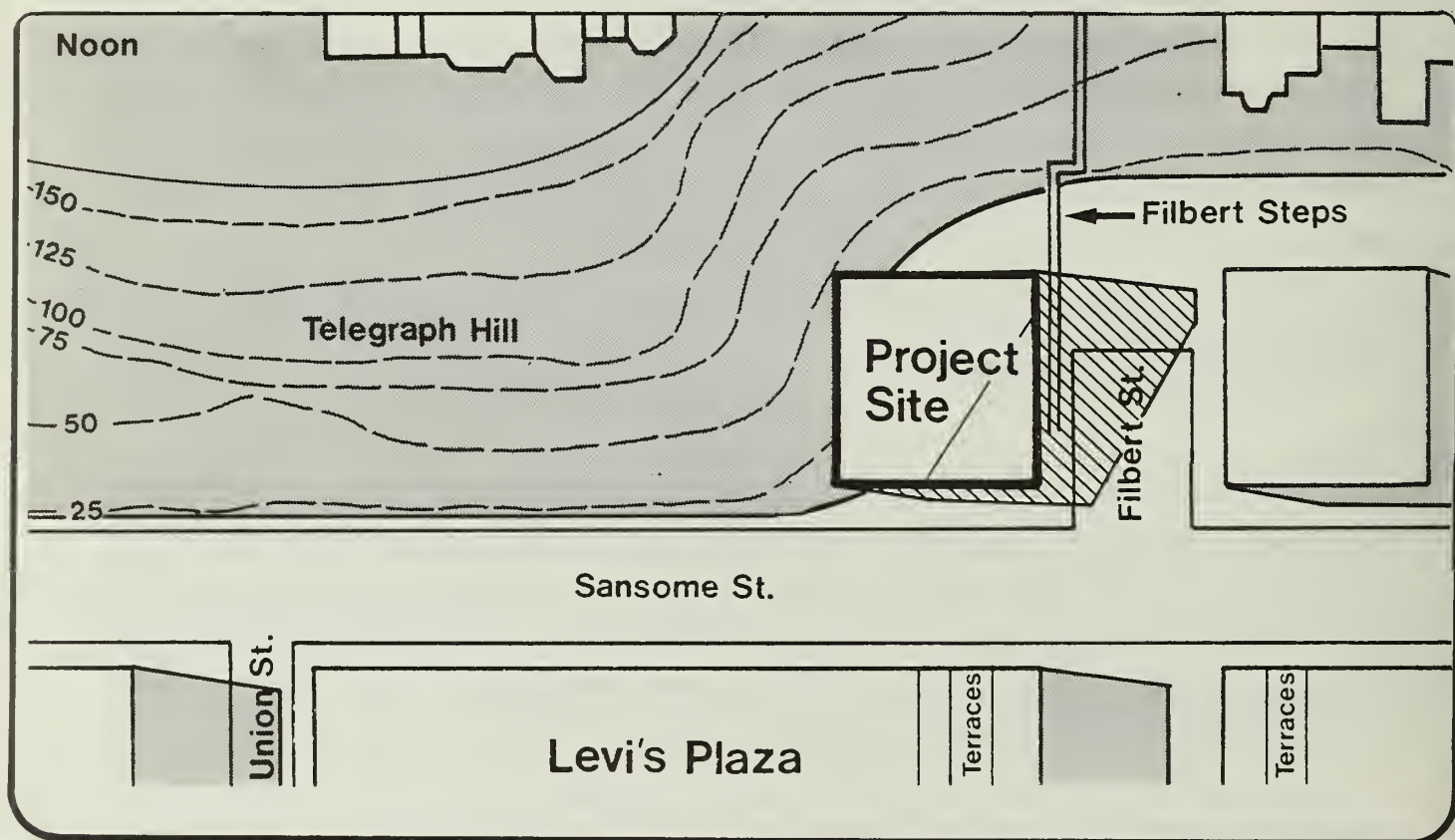
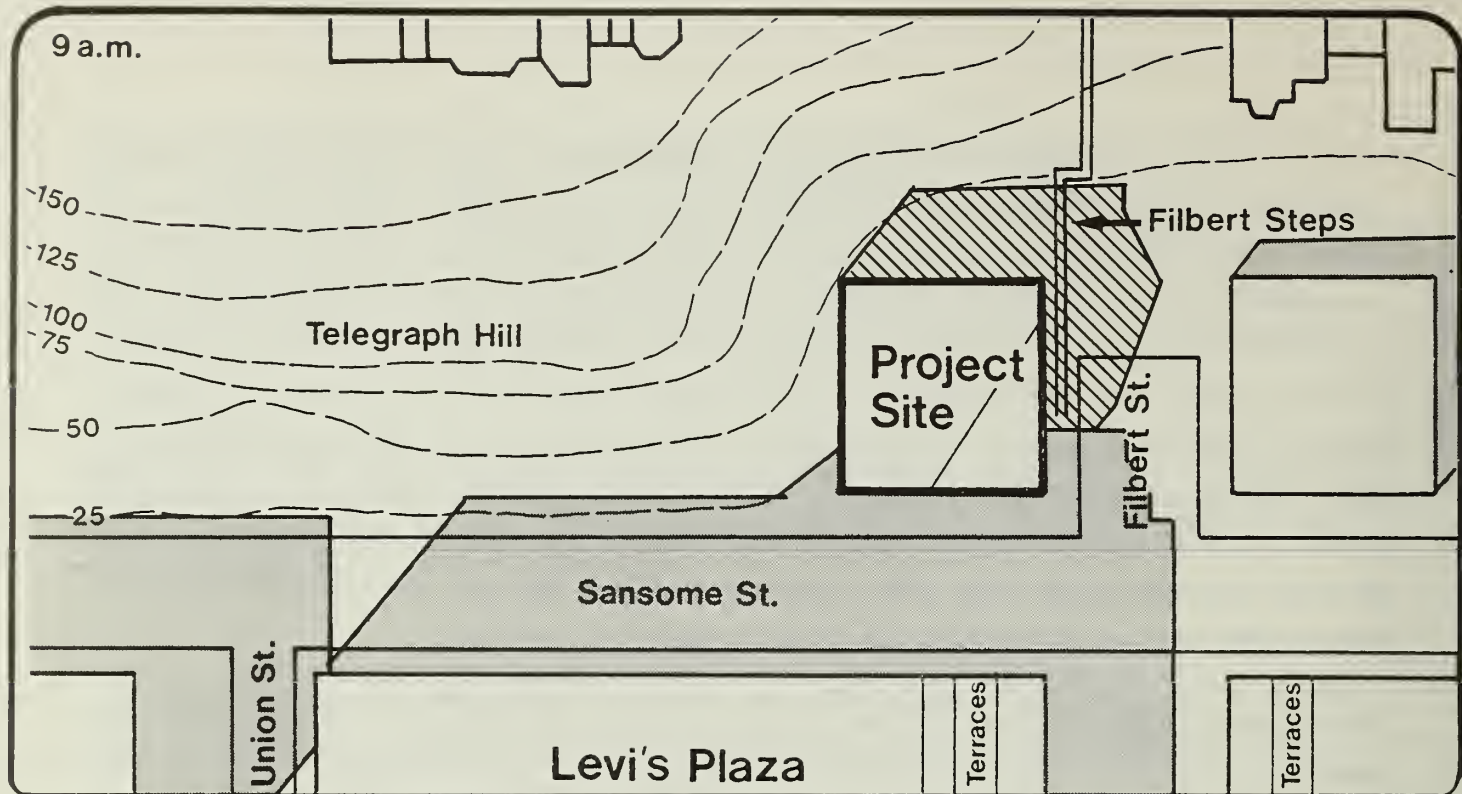
After the structure would be built and occupied, noise associated with building operations would not increase day and nighttime noise levels above those presently existing at the site. The amount of traffic generated by the project during any hour of the day would cause traffic noise to increase less than 1 dBA which would not be a perceptible increase. Due to the planned design, no perceptible noise impact would be expected due to the operation of the building's mechanical equipment which would be contained within the building's interior. The structure is intended for day use, and the mechanical equipment would be turned off at night.

Construction generally would occur between the hours of 8 A.M. and 5 P.M. Construction would not occur on weekends.



Shadows

Figures 27, 28, 29, pages A-36,37,38 indicate shadow patterns the proposed structure would project during various portions of the year. The analysis is for periods when the sun would be lowest in the sky (Dec. 21), through the period in which the sun would be highest in the sky (June 21). The times of analysis are 9 A.M. and 12 noon wherein the proposed building would cast maximum and minimum shadows, respectively. At 4 P.M. the project would be within the shadow cast by Telegraph Hill in all seasons. At

¹Jim Passage, Construction Estimator, Apersey Construction Company, telephone conversation, 3 November 1972.



Shadow Patterns-March/September

-  Existing Shadows
-  Shadows Added by Proposed Project

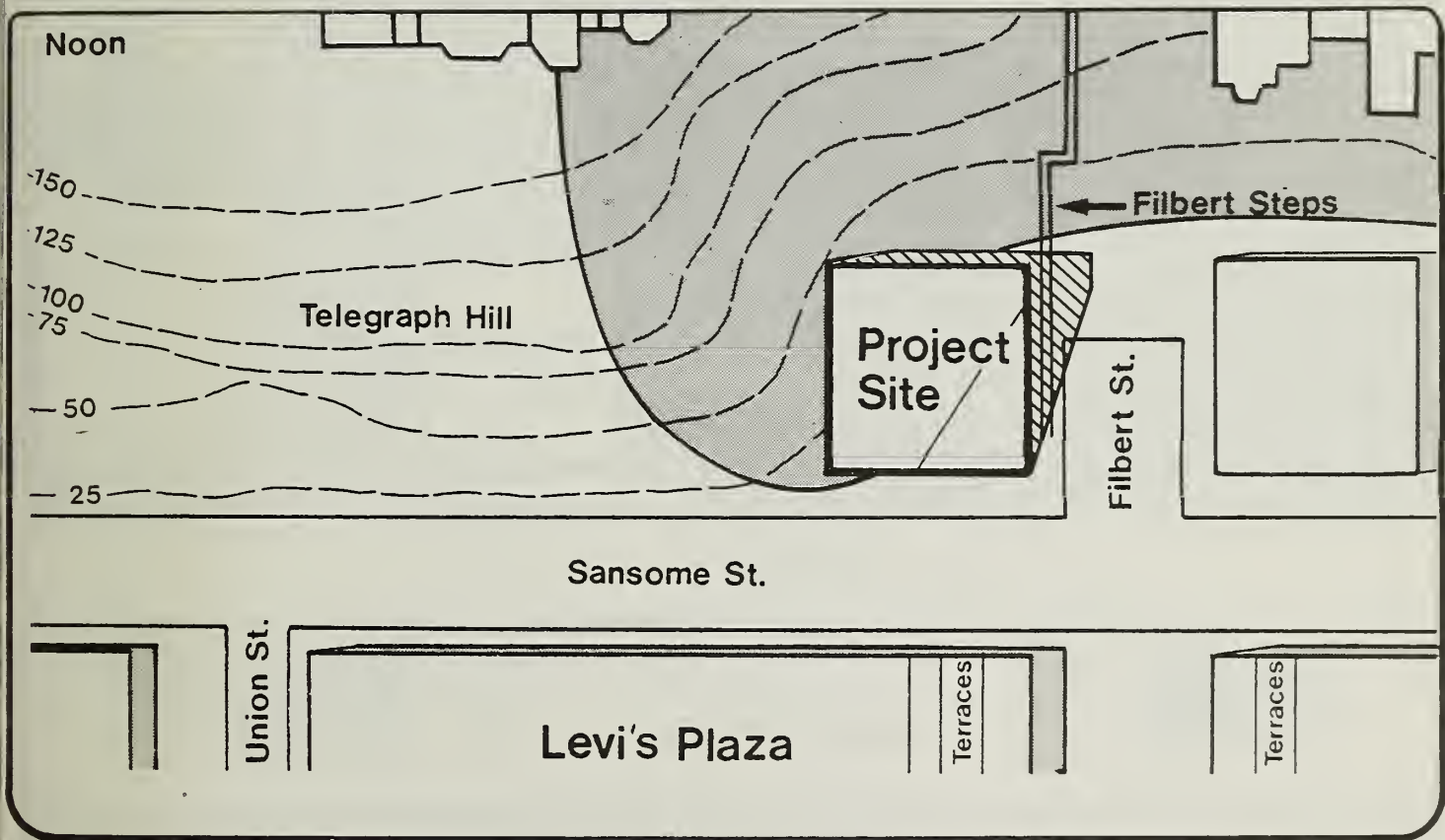
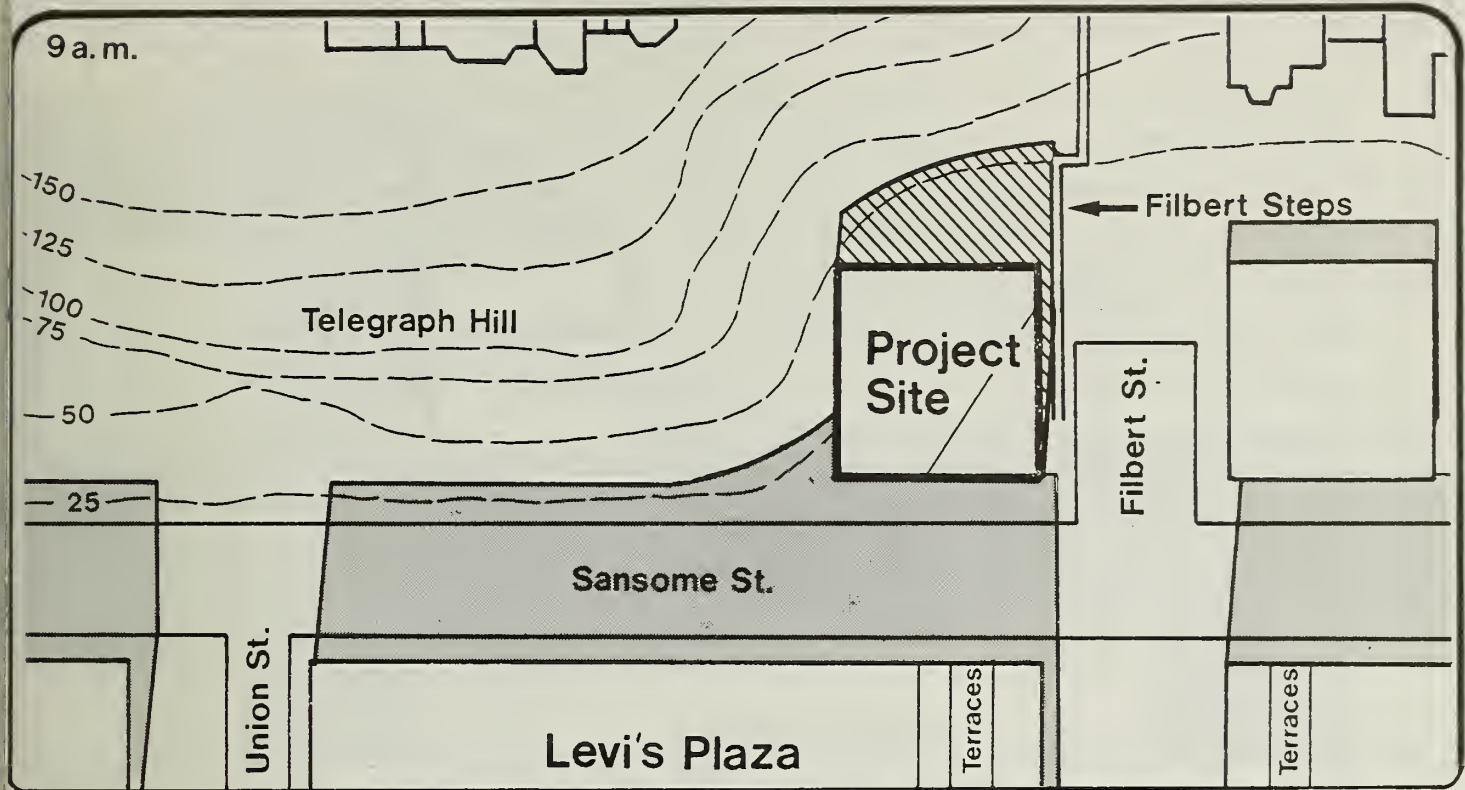
SOURCE: EIP Corporation

0 25 50 100
Scale Feet



Figure No. 27

North





Shadow Patterns-June

-  Existing Shadows
-  Shadows Added by Proposed Project

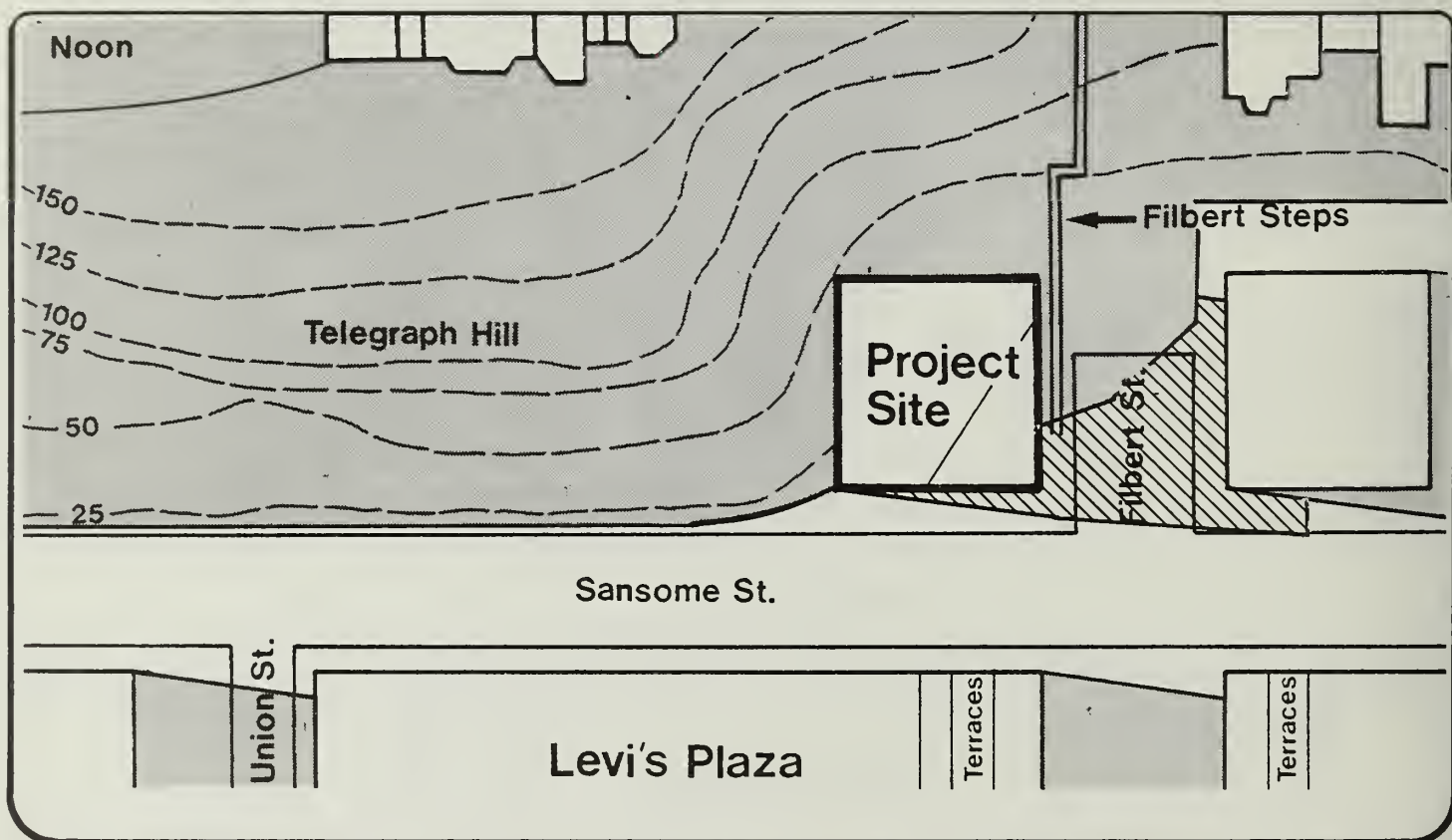
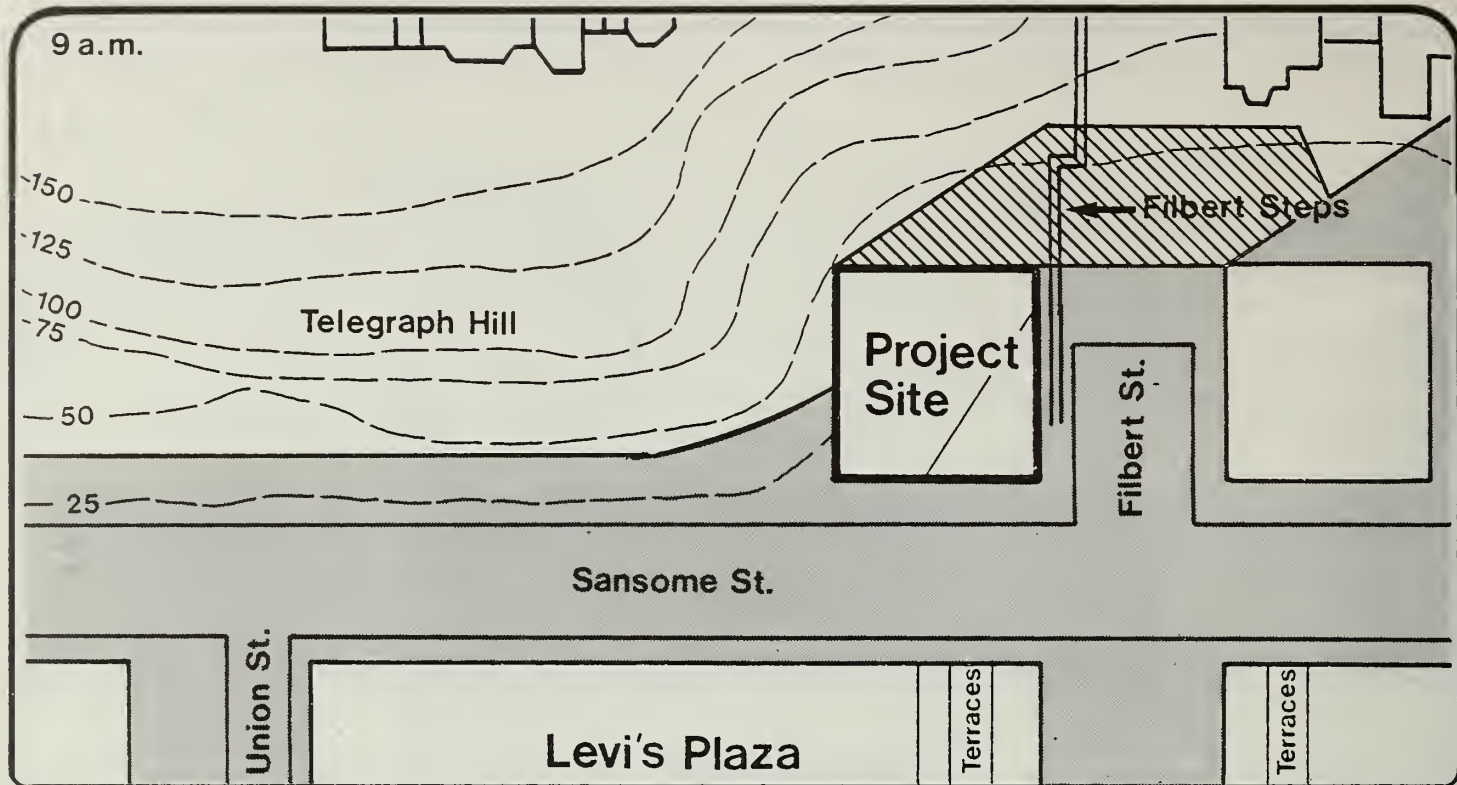
SOURCE: EIP Corporation

0 25 50 100
Scale Feet



North



Figure No. 28



Shadow Patterns-December

-  Existing Shadows
-  Shadows Added by Proposed Project

SOURCE: EIP Corporation

0 25 50 100
Scale Feet

North



Figure No. 29

9 A.M. during spring, fall and winter, the project would cast a shadow across the lower portion of the Filbert Street steps, but would not cast a shadow across the steps at 9 A.M. in summer. At 12 noon during the spring, summer and fall, the building would cast a shadow across the landing of the steps at Filbert Street; the steps would be within the shadow cast by Telegraph Hill at 12 noon during the winter, and would also be within the shadow of the hill during afternoon periods during other portions of the year. The proposal project would not cast shadows on the gardens of Telegraph Hill planted and maintained by local residents.

COMMUNITY SERVICES

Environmental Evaluation Checklist

Utilities and Public Services. Would the proposed project:

Yes Maybe No N/A Disc.

Have an effect upon, or result in a need for, new or altered governmental services in any of the following?

1. fire protection	—	—	<u>X</u>	<u>X</u>
2. police protection	—	—	<u>X</u>	<u>X</u>
3. schools	—	—	<u>X</u>	—
4. parks or other recreational facilities	—	—	<u>X</u>	—
5. maintenance of public facilities	—	—	<u>X</u>	—
6. power or natural gas	<u>X</u>	—	—	<u>X</u>
7. communications systems	—	—	<u>X</u>	—
8. water	<u>X</u>	—	—	<u>X</u>
9. sewer/storm water drainage	<u>X</u>	—	—	<u>X</u>
10. solid waste collection and disposal	—	—	<u>X</u>	<u>X</u>

Hazards. Would the proposed project result in:

1. Increased risk of explosion or release of hazardous substances (e.g., oil, pesticides, chemicals or radiation), in the event of an accident, or cause other dangers or public health and safety?	—	—	<u>X</u>	—
2. Creation of or exposure to a potential health hazard?	—	—	<u>X</u>	—
3. Possible interference with an emergency response plan or emergency evacuation plan?	—	—	<u>X</u>	<u>X</u>

IMPACTS

Fire

The proposed project would increase the building area of the site and the number of persons using the project area and may increase the fire hazard. The 84-foot tall

structure is classified as a high rise and would have to conform to applicable standards of the San Francisco building code. Emergency access doors would be provided on Sansome and Filbert Streets. A fire safety director would be required at the office building who would be trained through a fire prevention course provided by the Bureau of Fire Prevention. The course trains the employee to be prepared for various situations ranging from bomb scares to earthquakes. This person would be responsible to establish an evaluation plan for the building's employees. The City's emergency response plan provides for a "command post" to be established at the Central Fire Department located near City Hall) where a line of communications between utilities and services would be set up to keep agencies advised as to the locales and severity of problems. These stations serve the project area: Station 13 at 530 Sansome, Station 28 at 1814 Stockton and Station 2 at 1340 Powell Street. Water pressure is adequate in the project area for fire suppression. The project would not require additional Fire Department personnel or equipment.¹ Cumulatively, if more than one 2 or 3 alarm fires would occur in the project area, the fire department could experience some difficulty in additional fire protection due to the availability of men and equipment as the department must also maintain fire protection for the rest of the City. The structure would be constructed to adhere to the requirements set forth by the San Francisco Building Code.¹

Police

The project is patrolled regularly by the San Francisco Police Department. The project site is within Central District reporting area 316. For the first 9 months of 1981, 324 incidents of crime were reported, ranking the area 19th in Central District's 26 reporting areas. The proposed 41,000-square foot office building would increase population and personal property on the site, thereby increasing the opportunity for crime. However, street lighting would be increased at the site and security features would be incorporated into design of the elevator, stairwells and entry doors. No guard or monitoring system is anticipated at the proposed project. Additional manpower or equipment would not be required by the Police Department for the project.²

¹ Joseph Sullivan, Chief, Planning, San Francisco Fire Department, telephone conversations, 27 October and 4 November 1981.

² Paul Libert, Sergeant, Crime Analysis, San Francisco Police Department, telephone conversation, 26 October 1981.

Water

The proposed office would use an estimated 1,350 to 2,025¹ gallons per day. There is an 8-inch low pressure water main on Sansome which would serve the project site. The water main is of adequate size to serve the demands of the proposed project.²

Wastewater

The amount of wastewater generated would be approximately the same as the water consumed. A 12-inch main under Filbert and an 8-foot 6-inch sewer under Sansome have adequate capacity to serve the project.³ Wastewater is carried to the Northpoint Water Pollution Control Plant, which has a general maximum capacity of 135 million gallons per day (mgd) and an emergency capacity of 150 mgd.

Energy

There would be an increase in energy consumption at the project site. A gas main beneath Sansome Street and overhead electrical lines in front of the project site would serve the proposed building. PG&E does not anticipate gas or electric supply problems (see Energy, page A-47).⁴

Solid Waste

Golden Gate Disposal Company serves the project area. Solid waste removal takes place as often as necessary or requested and is brought to a transfer station west of Candlestick Park before its final destination, the Mountain View dump. The proposed project is anticipated to generate about 400 dry pounds of solid (paper) waste per day or 1 ton per work week.⁵ Trash compactors would not be used in the building; solid waste would be

¹Rau, J.G., and D.C. Wooten, Environmental Impact Analysis Handbook, Table 6.11, McGraw-Hill, New York 1980.

²Cy Wentworth, Water Estimator, City Distribution Division, San Francisco Water Department, telephone conversation, 26 October 1981.

³Nat Lee, Engineer, San Francisco Clean Water Program, Department of Public Works, telephone conversation, 26 October 1981.

⁴Bill MacIntosh, Industrial Power Engineer, Pacific Gas and Electric, telephone conversation, 26 October 1981.

⁵State of California, Solid Waste Management Board, 1974 Solid Waste Generation Factors in California, total gross sq. ft. x 1 lb. per 100 gross sq. ft. per day.

bagged or deposited in front loader containers.¹ There would be no use of toxic substances in the building requiring ultimate disposal.

¹Inez Bini, Assistant Office Manager, Golden Gate Disposal Company, telephone conversation, 26 October 1981.

SOILS AND GEOLOGY¹

Environmental Evaluation Checklist

Land. Would proposed project result in or be subject to:

1. Potentially hazardous geologic or soils conditions on or immediately adjoining the site? (slides, subsidence, erosion, and liquefaction)
2. Grading? (consider height, steepness and visibility of proposed slopes; consider effect of grading on trees and ridge tops)
3. Generation of substantial spoils during site preparation, grading, dredging or fill?

Yes Maybe No N/A Disc.

— X — — X

X — — — X

— — X — X

Water. Would the proposed project result in:

1. Reduction in the quality of surface water?
2. Change in runoff or alteration to drainage patterns?
3. Change in quality of public water supply or in quality or quantity (dewatering) of groundwater?

— — X — —

— — X — —

— — X — X

Soils and geology will be discussed in detail in subsequent environmental documentation. The following brief analysis is provided for this Initial Study:

The site is level at approximately +12 feet San Francisco Datum.² Adjacent rock slopes south and west of the site are between 100 and 140 feet high having overall inclinations of about 1/2:1 to 3/4:1 with localized vertical or overhanging sections. The site and adjacent slopes are underlain by sandstone, with some siltstone and shale, of the Franciscan Formation.

¹The material in this section is derived from: Wood, W.C., Dames & Moore Associates, Report, Geotechnical Consultation, 1299 Sansome Street, San Francisco, 7 October 1981. This document is available for inspection at the San Francisco Office of Environmental Review, 45 Hyde Street, San Francisco, CA, 94102.

²San Francisco Datum is approximately 8.6 feet above mean sea level.

The site is within the area quarried during the late 1800s for sea wall construction. In 1971 a rock slide involving tens of thousands of cubic yards of rock occurred along the old quarry wall several blocks northwest of the site. In 1978 a massive block (wedge-shaped because of the intersecting sets of fractures) slid from the hill slope 200 feet south of the project site. In 1967 movement of surface soil and weathered rock undermined a residential structure on Alta Street south of the site. Debris from recent rock falls has accumulated at the southwest corner of the existing building on the site.

The existing building has a finished floor about 3 feet above the grade of the proposed project. It is not known whether the existing floor is on solid rock or backfill. In either case, approximately 1,300 cubic yards (up to 3,500 tons) of rock debris would need to be excavated to level the site and remove the accumulated rockfall material from the southwest corner of the property.

There are no ornamental or decorative trees on the site and none would be affected by grading operations.¹ In order to remove seepage water or runoff accumulating beneath the structure, the ground floor slab would be provided with an underdrain system of perforated pipes and a 6" thick layer of permeable material draining to a sump. Drain rock and perforated pipes and a 6" thick layer of permeable material draining to a sump. Drain rock and perforated pipe also would be provided behind the walls or retaining structures bearing against the hill slopes.²

No piledriving is planned for the site since the building would be supported on spread footings.

¹ An existing tree, about 15 feet high located eleven feet from the north building wall, would be removed by the site demolition contractor prior to building construction. The tree is not located on the property of any area resident, but is located off the project site adjacent the existing loading dock in the Filbert Street right-of-way.

² Wood, W.C., Dames & Moore Associates, Report, Geotechnical Consultation, 1299 Sansome Street, San Francisco, 7 October 1981, page 8.

No dewatering is planned for the site, other than the proposed underdrain system, since no excavation would take place below the water table. The water table is close to the surface in areas underlain by bedrock around the Base of Telegraph Hill¹ but is probably in a perched or trapped condition² thereby reflecting recent surface runoff conditions rather than deep groundwater conditions.

The most probable seismic-induced hazard that would affect the proposed project is landsliding.³ Since the site is on bedrock⁴ there is no danger of liquefaction or subsidence.⁵ The site is not crossed by any active fault⁶ and the site is 4 feet above the predicted tsunami runup for the 500-year flood at high tide.⁷ Estimated groundshaking at the site during a great earthquake would be "strong."⁸

¹Department of City Planning, Final EIR, Levi's Plaza, EE 77.256, San Francisco, certified 14 December 1978, Vol. I, p. 53.

²Wood, W.C., Dames & Moore Associates, Report, Geotechnical Consultation, 1299 Sansome Street, San Francisco, 7 October 1981, page 8.

³URS/John A. Blume and Associates, San Francisco Seismic Safety Investigation, San Francisco, June 1974, Figure 4.

⁴Wood, Op. cit., page 3.

⁵The 1852 Shoreline, which is approximately the western limit of artificial fill in this area, crosses Filbert Street 200 feet east of Sansome Street

⁶Schlocker, J., Geology of the San Francisco North Quadrangle, California, Wash. D.C., U.S. Geological Survey Prof. Paper 782, 1974, plate I, scale 1:24,000.

⁷Garcia, A. and J. Houston, Tsunami Predictions for Monterey and San Francisco Bays and Puget Sound, Wash., D.C., U.S. Army Corps of Engineers, Tech. Report H-75-17, November 1975, Figure 55.

⁸URS/John A. Blume and Associates, San Francisco Seismic Safety Investigation, San Francisco, June 1974, Figure 3.

ENERGY

Environmental Evaluation Checklist

Would the proposed project
result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Any change in consumption of energy?	<u>X</u>	—	—	—	<u>X</u>
2. Substantial increase in demand on existing energy sources?	—	—	<u>X</u>	—	—
3. An effect on the potential use, extraction, conservation or depletion of a natural resource?	—	—	<u>X</u>	—	<u>X</u>

SETTING

Energy was used on site by the previous antique goods dealer leasing the existing building. Annual energy consumption was approximately one billion BTU, equivalent to 180 barrels of oil.²

IMPACTS

The project would increase consumption of non-renewable energy resources on the site. Site preparation and building construction would require approximately 10 billion BTU of energy, equivalent to 1,790 barrels of oil.³

¹Natural gas consumption calculations supplied by Vann Engineering Corporation, 8 October 1981. Electrical consumption calculations supplied by The Engineering Enterprise, 26 October 1981. Both documents are available for review at the San Francisco Office of Environmental Review, 45 Hyde Street, San Francisco, CA, 94102.

²Hugh Carter Engineering Corporation, Non-Residential Energy Conservation Standards, Title 24, Economic and Energy Effectiveness Study, State of California Energy Resources Conservation and Development Commission, 5 November 1975.

³Assumes a construction cost of 4 million (1981) dollars and a ratio of 2,500 BTU per 1981 dollar (Tetra Technology, Energy Use in the Contract Construction Industry, Arlington, Virginia, 1975).

The project's estimated average monthly electrical consumption would be 45,000 kilowatt hours (Kwh), equivalent to 1.01 Kwh per gross square foot of air conditioned floor area. This figure can be compared with consumption rates at recently approved buildings of 1.2, 2.5, and 1.9 Kwh per square foot at 505 Sansome, and 495 and 444 Market, respectively.

Generation of electricity to satisfy monthly project demand would require 423 million BTU, equivalent to 76 barrels of oil, of non-renewable energy consumed at the source, plus 29 million BTU of renewable energy.^{1,2,3} The connected kilowatt load would be 395 kw.

The project would consume an average of 35 million BTU of natural gas per month, equivalent to 350 therms of natural gas. This is equivalent to a monthly average of 800 BTU per gross square foot of air conditioned floor area. The magnitude of the peak natural gas demand would be 1.2 million BTU per day, equivalent to 12 therms of natural gas per gross square of air conditioned floor area. This can be compared to rates of 7,900, 6,600 and 2,640, respectively, for the buildings in the preceding paragraph.

Project electricity demand would peak in August at 2:30 P.M., when demand for electricity would be high, system wide. PG&E's peak electricity demand is also in August, although at 4:00 P.M. Project natural gas demand peaks in January at 8:30 A.M.; this would coincide with PG&E's peak use period which occurs from 6:00 to 9:00 P.M. in January.

Lifetime Energy Costs

Based upon an expected lifetime of 65 years for the building, and excluding transportation energy use, the project's lifetime energy use would be 404 billion BTU,

¹BTU (British Thermal Unit): A standard unit for measuring heat equal to that from burning one standard wooden kitchen match. Technically, it is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit (251.98 calories) at Sea Level.

²Assumes a generating mix of 19% hydroelectrically generated energy (Pacific Gas & Electric Annual Report to Stockholders 1980).

³Energy conversion factors:

1 barrel crude oil = 5.6 million BTU

1 gallon diesel = 140,000 BTU

1 KWH = 10,239 BTU assuming operational efficiency of 33% for fossil or nuclear fueled power plant.

equivalent to 73,000 barrels of oil, of which 10 billion BTU would be for construction, 356 billion BTU for electricity, 28 billion BTU for gas and 10 billion for demolition.

Title 24, Division 20, Article 2 of the California Administrative Code regarding Energy Conservation Standards for New Non-Residential Buildings sets a maximum allowable energy consumption for non-residential buildings with an occupancy of under 300 persons of 141,000 BTU per gross square foot of heated and cooled floor space per year.¹ The corresponding figure for this project is estimated at 134,000 BTU; Title 24 requires that the structure's energy budget be analyzed by an independent consultant prior to the issuance of a building permit. This would result in a more accurate estimate of the project's energy budget due to the application of a state approved energy analysis program and the additional details of the building design which will be available later in the design process.

There would be motor vehicle energy consumption by occupants of the building. Based upon the estimated regional Vehicle Miles Travelled (VMT) resulting from project-generated traffic, annual auto transportation energy consumption would be 72,000 gallons of gasoline, equivalent to 9 billion BTU or 1,600 barrels of oil. This would be about 3% of the structure's estimated annual energy use. Energy consumed for bus, rail, and ferry transit would be in addition to this quantity of energy.

MITIGATION

Measures Proposed as Part of Project

I. Visual Quality and Urban Design

- a) Street trees would be provided along Sansome in front of the building.
- b) The northeast corner of the building would be canted (sloped) inward from the third floor to the roof to avoid obstructing views to the Bay from residents of Telegraph Hill near the Filbert Street steps. In addition, no rooftop mechanical penthouse would be constructed; all mechanical equipment would be housed within the building's interior.
- c) The existing earthen bank near the foot of the Filbert Street steps would be planted with flowering shrubs.

2. Land Use

The proposed project would conform to the height and bulk requirements of the San Francisco Planning Code. A variance would be sought to allow off-site parking of 77 spaces.

3. Transportation

- a) Improvements, as yet unspecified, would be made to the Filbert Street steps connection to Filbert Street adjacent to the project. The Filbert Street sidewalk and curb area would be reconstructed adjacent to the project. (This reconstruction would enhance pedestrian access and discourage vehicles from parking on the sidewalk area). These features will be addressed in detail in the subsequent focused EIR.
- b) Parking would be provided off-site within an 800-foot walking distance at an existing parking facility under a 65-year lease agreement.
- c) The project sponsor would contribute to a fund for maintaining and augmenting transportation services, in an amount proportionate to the demand created by the project, through an equitable funding mechanism (transit improvement fee and/or transit assessment district).
- d) The project sponsor would encourage transit use by employees in the proposed building by means including the sale on-site of BART and MUNI passes, and promoting an employee car pool/van pool system in cooperation with RIDES for Bay Area commuters, or other such enterprises.

- e) When the project is completed the project sponsor would, in consultation with the Department of City Planning, implement a flexible time system for employee working hours.
- f) Within a year from completion of the project, the project sponsor would conduct a survey in accordance with methodology approved by the Department of City Planning, to assess actual trip generation patterns of project occupants, and actual pickup and drop off areas for car poolers and van poolers. This survey would be made available to the Department of City Planning. Alternatively, at the request of the Department of City Planning the project sponsor would provide an equitable in-lieu contribution for an overall survey of the downtown area to be conducted by the City.
- g) During the construction process, pedestrian access would be maintained along Sansome Street adjacent to the project site and along the Filbert Street steps. Construction deliveries would not be allowed during the peak traffic hours (7:30-8:30 A.M. and 4:30-5:30 P.M.).
- h) Eyebolts (to support future Muni electrification wires) would be incorporated into the project.
- i) One on-street freight loading space would be provided on Filbert Street, subject to approval by the Police Commission and Department of Public Works.
- j) The project sponsor would request increased enforcement of parking regulations in the area.⁴

4. Noise

Ventilation and air conditioning cooling towers would be housed in a sound-insulated "chimney" at about the fifth floor level to reduce mechanical equipment noise.

5. Community Services

- a) The project sponsor would assign a fire safety director for the building who would be trained through a fire prevention course provided by the Bureau of Fire Prevention.
- b) The building design would incorporate internal security features in elevator, stairwell and entry door areas. Exterior lighting would be designed to reduce opportunities for crime. The garage structure would be well lighted during evening and early morning hours to provide greater safety for users, especially workers taking advantage of flex time work hours.

- c) An evacuation and emergency response plan would be developed by project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services, to insure coordination between the City's emergency planning activities and the project's plan and to provide for building occupants in the event of an emergency. The project's plan would be reviewed by the Office of Emergency Services and implemented by building management before issuance by the Department of Public Works of final building permits.

6. Energy

Measures Proposed as Part of Project

- a) All recessed fluorescent lighting fixtures in the office spaces would be the return air/heat extract type. This feature improves fixture efficiency (approximately 10% more light for the same power draw) and reduces the cooling load requirements for the building, since a major portion of the fixtures' heat is drawn into the return air plenum and does not enter the air conditioned spaces.
- b) Most fluorescent fixtures for the office space would contain 3 tubes, allowing the user to select one-third, two thirds or full-level light output depending on the user's needs and daylight contribution.
- c) All enclosed offices would contain 2 local switches to allow the user to select the desired light level (one-third, two-thirds or full-level).
- d) HVAC equipment with the highest coefficient of performance would be used.
- e) An air type economizer cycle would be used to take advantage of outside air when it is cool enough to provide cooling without using the chiller.
- f) Relief air during the economizer cycle would be used to lower the temperature in the cooling tower, thus driving the coefficient of performance up.

- g) Inlet vanes on the main supply fans would be used to reduce the horse power during part load conditions.
- h) Reset temperatures would be used to reduce or turn off boiler as the outside temperature rises.
- i) Reset temperatures would be used to provide only enough cooling to satisfy the warmest zone.
- j) "Dead band" type variable air volume boxes and room thermostats would be used to ensure that simultaneous cooling and heating do not occur.
- k) The project sponsor would cooperate with the architect to develop well-insulated walls, roofs and floors to provide the best heat-resistant envelope possible.

Energy Conservation Measures Considered But Rejected

- a) Employ air-to-air heat exchangers to temper the incoming outside air with heat either rejected from or added to the exhaust air.

Rejected because:

- Costly and inefficient.
- Not sufficient enough exhaust air to contribute greatly to the tempering of the outside air.

- b) Employ rejected heat from the chiller condenser to preheat domestic hot water.

Rejected because:

- Costly and inefficient.
- The requirement for domestic hot water is low and a negligible part of the total energy usage.
- Pumping cost would exceed benefits.

- c) Employ Solar panels to provide domestic and heating water requirements

Rejected because:

- Costly and inefficient.
- Requirement for heating either of domestic or heating water is a negligible part of total energy usage.

- The building site is not conducive to solar panels since Telegraph Hill lies to the south, southwest, and west of the building rendering the best hours of solar collection useless.

d) Employ renewable energy sources (incineration of waste material)

Rejected because:

- Costly.
- Not permitted without stringent requirement to clean up products of combustion vented to the atmosphere.

e) Employ steam from utility grid

Rejected because:

- Not available at project site.
- No new customers are being accepted.

ALTERNATIVES

A. PROJECT ALTERNATIVES

Since the project site was purchased in March 1981, two alternative uses of the site have been considered: commercial and housing. Due to the immediately adjacent Levi Strauss project (Levi's Plaza EE 77.256), which incorporates commercial facilities within it (shops, banks, restaurants), it was decided by the project sponsor that exclusive commercial use of the project site would not be necessary or needed because the demand for commercial space in the project area would have been fulfilled by the commercial facilities of Levi's Plaza.

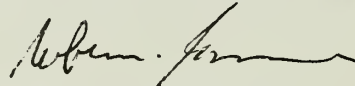
Condominium housing also was considered and rejected. Over 400 units of condominium/rental housing are under development by the project sponsor team within a 2½ block radius of the project site including about 200 upper middle income units at the corner of Lombard and Sansome Streets, and about 225 moderate income units at Wharf Plaza I and II located at Francisco and Kearny Streets. The project sponsor believes that this fulfills the demand for upper middle income housing for the area. The sponsor believes that a mixed use in the area including offices as well as commercial is the most acceptable use to area residents and businesses.

XIII. MANDATORY FINDINGS OF SIGNIFICANCE

	<u>Yes</u>	<u>No</u>	<u>Disc.</u>
1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, below self-sustaining levels, threaten to eliminate a plant or animal, or eliminate important examples of the major periods of California history or prehistory?	___	<u>X</u>	___
2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?	<u>X</u>	___	___
3. Does the project have the possible environmental effects which are individually limited, but cumulatively considered? (Analyze in the light of past projects, other current projects, and probable future projects?)	<u>X</u>	___	___
4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?	___	<u>X</u>	___
5. Is there a serious public controversy concerning the possible environmental effect of the project?	<u>X</u>	___	___

On the basis of this initial evaluation:

- ___ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.
- ___ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers ___, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.
- X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



Robert W. Passmore
Assistant Director-Implementation

for

Dean Macris
Director

Date: 3/18/82

